

# **EXHIBIT**

# **1**

209 Capitol Street  
Charleston, WV 25301  
Tel: 304.345.6555  
Toll Free: 877.852.0342  
Fax: 304.342.1110

December 18, 2021

LTL Management Talc Creditors' Committee

Invoice #: 86189  
Client #: TCC0001  
Matter #: 2003717

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### INVOICE SUMMARY

For professional services rendered through December 15, 2021:

**RE: LTL Bankruptcy**

Professional Services	\$ 867,462.50
Total Expenses Advanced	<u>\$ 17,967.57</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 885,430.07</b>

BAILEY & GLASSER LLP

Talc Creditors Committee  
LTL Bankruptcy

December 18, 2021  
Invoice #: 86189

PROFESSIONAL SERVICES RENDERED

B110 Case Administration

Date	Init	Task	Actv	Description of Service	Hours	Rate	Amount
11/12/21	BAG	B110		Call with committee member on local counsel.	.10	975.00	97.50
	BAG	B110		Call with potential local counsel.	.20	975.00	195.00
	KB	B110		Conference call with Brown Rudnick, Glasser and Bennett re division of labor on initial matters, including committee bylaws and structure.	.50	975.00	487.50
	MBB	B110		Prepare notice of appearance and demand for service of papers and prepare PHV motions.	.30	550.00	165.00
	JEK	B110		Draft motions to appear pro hac vice for B. Glasser, K. Barrett, T. Bennett and M. Burrus.	1.80	325.00	585.00
11/14/21	CLJ	B110		Review debtor informational brief and First Day declaration.	2.00	750.00	1,500.00
11/15/21	KB	B110		Review memorandum drafts and final.	.20	975.00	195.00
	CLJ	B110		Review research, re: opposition to informational brief.	1.00	750.00	750.00
	JEK	B110		Telephone calls to and from NJ Bankruptcy Court Clerk's office regarding pro hac vice motions for transferred case.	.20	325.00	65.00
11/16/21	BAG	B110		Call with Moulton and Stark on upcoming Jones Day meet and confer.	.20	975.00	195.00
	KEC	B110		Strategy communication with members of Creditors Committee counsel regarding document needs related to drafting of responses to Informational Brief.	.60	750.00	450.00
	KB	B110		Email and text correspondence with Glasser and Burrus re committee meeting and allocation of tasks.	.20	975.00	195.00
	MBB	B110		Review committee meso and OC materials to facilitate preparation of introductory brief.	2.00	550.00	1,100.00
	JEK	B110		Draft motions for admission pro hac vice for K. Barrett, B. Glasser, M. Burrus and T. Bennett and e-mail to M. Burrus.	.80	325.00	260.00
11/17/21	KEC	B110		Analysis of documents related to drafting of responses to Informational Brief.	1.60	750.00	1,200.00
	KB	B110		Confer with B Glasser re work assignments and status conference with court.	.20	975.00	195.00
	KB	B110		Review and revise pro hac application and email correspondence with J Kittinger re same.	.20	975.00	195.00
	CLJ	B110		Draft medical section for initial brief to court.	1.50	750.00	1,125.00
	MBB	B110		Prepare portions of introductory brief.	9.40	550.00	5,170.00

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Date	Init	Task	Actv	Description of Service	Hours	Rate	Amount
	JEK	B110		Revise motions for admission pro hac vice for K. Barrett, B. Glasser, M. Burrus and T. Bennett and e-mail to M. Burrus.	.80	325.00	260.00
11/18/21	BAG	B110		Edits to science section of the response to the LTL informational brief and email traffic and calls on same.	1.10	975.00	1,072.50
	KEC	B110		Communication with Committee member representatives regarding drafting projects and committee business.	1.20	750.00	900.00
	DLS	B110		Review Draft Response to LTL Information Brief, Science Section. Edits to Draft. Communications Re Edits with Brian Glasser.	.50	750.00	375.00
	KB	B110		Confer with M Burrus re informational brief.	.20	975.00	195.00
	CLJ	B110		Review documents and draft medical section for initial informational brief.	9.00	750.00	6,750.00
	MBB	B110		Continue preparation of introductory brief.	6.50	550.00	3,575.00
	JEK	B110		Prepare in person appearance forms for T. Bennett and B. Glasser	.40	325.00	130.00
11/19/21	BAG	B110		Edit and circulate Committee opening statement along with email traffic on same.	.90	975.00	877.50
	KEC	B110		Communications with committee representatives and counsel regarding response to Informational Brief and representative refiling.	.80	750.00	600.00
	KB	B110		Review Committee's initial statement and email correspondence from co-counsel re same.	.40	975.00	390.00
11/20/21	DLS	B110		Telephone Conference with Brian Glasser: Preparation for 11/22 Hearing.	.30	750.00	225.00
	CLJ	B110		Review and edit initial brief.	.50	750.00	375.00
11/21/21	BAG	B110		Call among core counsel to assign roles and responsibilities for tomorrow's 11/22/21 hearing.	.30	975.00	292.50
	BAG	B110		Draft and circulate for comment my remarks for the hearing tomorrow.	.70	975.00	682.50
11/22/21	BAG	B110		Preapre for and attend first hearing in Trenton.	4.50	975.00	4,387.50
	KEC	B110		Attend via Zoom initial hearing in New Jersey for the transition to new jurisdiction.	1.50	750.00	1,125.00
	CLJ	B110		Attend NJ Bankruptcy hearing remotely.	1.50	750.00	1,125.00
	TBB	B110		Preparing for and participating in first hearings in New Jersey bankruptcy court.	1.50	975.00	1,462.50
	MBB	B110		Attend status conference remotely.	1.50	550.00	825.00
	DTM	B110		Attend first hearing with NJ BK court via remote access.	1.50	750.00	1,125.00
11/23/21	BAG	B110		Email to committee on strategy point.	.10	975.00	97.50

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Date	Init	Task	Actv	Description of Service	Hours	Rate	Amount
11/24/21	BAG	B110		Review and edit agreement for the committee and circulate same for comment.	.60	975.00	585.00
	KB	B110		Email correspondence with D Stolz, D Clarke, J Kittinger and B Glasser re notice of appearance in adversary proceeding.	.20	975.00	195.00
	KB	B110		Review and revise draft notice of appearance and email correspondence with Bennett and Kittinger re same.	.20	975.00	195.00
	MBB	B110		Confer with co-counsel re: extension of Debtor's deadline to file schedules to Dec 6.	.10	550.00	55.00
	JEK	B110		Finalize for filing and e-file notice of appearance in an adversary proceeding.	.60	325.00	195.00
12/01/21	BAG	B110		Meeting among counsel to go over agenda for committee meeting.	.50	975.00	487.50
	KB	B110		Review committee bylaws and email correspondence re same.	.10	975.00	97.50
	KB	B110		Counsel call re pending matters and upcoming committee call.	.30	975.00	292.50
	MBB	B110		Meeting with committee representatives re: case strategy.	2.00	550.00	1,100.00
	JEK	B110		E-mails to and from B. Glasser and T. Bennett regarding agenda for hearing on December 2, 2021.	.20	325.00	65.00
12/02/21	TBB	B110		Review of submissions for potential financial advisors.	1.10	975.00	1,072.50
	JEK	B110		Review docket and upload case documents and correspondence.	.80	325.00	260.00
12/03/21	MBB	B110		Call with committee counsel re: FAs.	1.10	550.00	605.00
	JEK	B110		Retrieval of case document and correspondence.	.50	325.00	162.50
	JEK	B110		Prepare forms and coordinate payment of Pro Hac Vice fee for B. Glasser and T. Bennett	.50	325.00	162.50
12/06/21	BAG	B110		Call with core co-counsel on UST letter response.	.50	975.00	487.50
	KB	B110		Review draft objection to QSF motion.	.20	975.00	195.00
	JEK	B110		Retrieval of correspondence and court filings.	.50	325.00	162.50
12/07/21	TBB	B110		Review and approval of revised motion for limited objection to proposed foreign representative.	.20	975.00	195.00
	TBB	B110		Review and approval of objection to qualified settlement fund trust.	.30	975.00	292.50
	JEK	B110		Retrieval of case document and correspondence.	.40	325.00	130.00
	JEK	B110		Register B. Glasser for telephonic hearing scheduled for December 7, 2021.	.20	325.00	65.00
12/08/21	BAG	B110		Call with Moulton on issues for the committee to consider.	.20	975.00	195.00

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Date	Init	Task	Actv	Description of Service	Hours	Rate	Amount
	DLS	B110		Review Supplemental Conflicts Check. Comment on Same.	.20	750.00	150.00
	KB	B110		Review schedules.	.40	975.00	390.00
	KB	B110		Confer with M Burrus re counsel and committee calls.	.30	975.00	292.50
	JEK	B110		Update case calendar regarding hearings and deadlines.	.20	325.00	65.00
12/09/21	KB	B110		Email correspondence with co-counsel and BG team re bankruptcy filings and effect on discovery and hearings.	.20	975.00	195.00
	KB	B110		Review various objections filed to pending motions, including Jones Day retention, QSF motion, and future claims representative.	.30	975.00	292.50
	KB	B110		Review letter regarding appointment of future claims representative.	.10	975.00	97.50
	JEK	B110		Review docket and retrieval of recently field documents.	1.10	325.00	357.50
12/10/21	MBB	B110		Review Debtor's schedules.	1.30	550.00	715.00
12/13/21	KEC	B110		Strategy call with Motion to Dismiss counsel regarding upcoming Omnibus Hearing.	.40	750.00	300.00
	TBB	B110		Zoom interviews with prospective financial advisors-2.5 hr.	2.50	975.00	2,437.50
	JEK	B110		Prepare and submit In-Person Pre-Appearence Sheet for T. Bennett and B. Glasser.	.20	325.00	65.00
	JEK	B110		Review docket and retrieval of recently field documents and correspondence.	.80	325.00	260.00
12/14/21	MBB	B110		Review hearing agenda for 12/15.	.10	550.00	55.00
	JEK	B110		Review docket and retrieval of recently field documents and correspondence.	.60	325.00	195.00
	JEK	B110		E-mails to and from M. Burrus regarding calendar deadlines and hearing dates.	.20	325.00	65.00
	JEK	B110		Review docket and retrieval of recently field documents and correspondence.	.50	325.00	162.50
	JEK	B110		Retrieval of Amended Initial Statement of Official Committee of Talc Claimants and e-mail to B. Glasser.	.30	325.00	97.50
12/15/21	TLC	B110		Observed LTL Hearing.	2.00	550.00	1,100.00
	KB	B110		Attend Court hearing by Zoom.	2.00	975.00	1,950.00
	TBB	B110		Preparing for and attending omnibus hearings.	3.00	975.00	2,925.00
	JEK	B110		Update case calendar regarding objection deadlines.	.40	325.00	130.00

**Sub-Total of Task**

**\$ 60,522.50**

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**B140 Relief from Stay/**

Date	Init	Task	Actv	Description of Service	Hours	Rate	Amount
11/11/21	TBB	B140		Reviewing/analyzing drafts of preliminary injunction for adversary proceeding extending automatic stay/determining application of automatic stay.	.30	975.00	292.50
11/12/21	BAG	B140		Calls and emails with team on strategy around preliminary injunction.	.50	975.00	487.50
	DLS	B140		Telephone Conferences and Emails with BG Team on Preliminary Injunction Strategy.	.20	750.00	150.00
	TBB	B140		Review of debtors' draft of proposed preliminary injunction order along with call with co-counsel regarding revisions to debtors' proposed preliminary injunction order.	.90	975.00	877.50
	TBB	B140		Review of further debtors' counsel's revisions to preliminary injunction along with call with the committee's counsel to further revise and respond to revisions to preliminary injunction order.	2.20	975.00	2,145.00
	DTM	B140		T/C with BG Team on PI strategy	.40	750.00	300.00
11/13/21	TBB	B140		Review, analysis, and drafting proposed modifications to debtor's proposed extension/application of stay preliminary injunction order and emails regarding issues in proposed responsive draft.	1.90	975.00	1,852.50
11/14/21	TBB	B140		Review and analysis of 11/14/21 Jones Day revisions to draft proposed order on preliminary injunction along with email to co-counsel on same and additional proposed revisions to revised debtor's revised draft of proposed order.	1.10	975.00	1,072.50
11/16/21	BAG	B140		Analysis of court's order imposing injunction on talc claims against non-debtor entities.	.20	975.00	195.00
11/21/21	TBB	B140		Analysis of recommendations on discovery for preliminary injunction extension request by LTL Management.	.30	975.00	292.50
12/09/21	MBB	B140		PI AP: Review Debtor's supplemental brief re: extension of preliminary injunction.	.90	550.00	495.00
12/12/21	DLS	B140		Calls and Emails with BG Team on Strategy for Preliminary Injunction.	.50	750.00	375.00

**Sub-Total of Task \$ 8,535.00**

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**B150 Meetings of and**

Date	Init	Task	Actv	Description of Service	Hours	Rate	Amount
11/12/21	BAG	B150		Review and respond to email traffic on agenda for TCC meeting.	.10	975.00	97.50
	BAG	B150		Attend TCC Meeting.	2.10	975.00	2,047.50
	DLS	B150		Prepare for and Attend Talc Creditors Committee Strategy Meeting.	2.10	750.00	1,575.00
	DLS	B150		Emails from David Molton Re Preparation for Upcoming TCC Meetings.	.10	750.00	75.00
	TBB	B150		Preparation for and participating in call with talc creditors' committee along with other counsel for creditors' committee regarding various strategic and administrative matters.	1.80	975.00	1,755.00
11/13/21	DLS	B150		Review docket information and internal info to prepare for Conference Call.	1.30	750.00	975.00
11/14/21	DLS	B150		Conference with Brian Glasser in NYC to Prepare for Talc Creditors Committee and Co-Counsel meeting.	.50	750.00	375.00
11/15/21	BAG	B150		Lengthy meeting with co-counsel and committee members to outline responsive briefing and identify workstreams.	7.50	975.00	7,312.50
	KEC	B150		Participate in meeting with Creditors Committee	7.50	750.00	5,625.00
	DLS	B150		Meeting with Talc Creditors Committee and Co-Counsel: Outline Responsive Briefing, Workstreams with Firms.	7.50	750.00	5,625.00
	KB	B150		Meeting of creditors committee and counsel re initial case strategy on contested matters.	7.50	975.00	7,312.50
	CLJ	B150		Conference with legal team and clients, re: background of case and strategy for next steps including discovery, motions and other briefing.	7.50	750.00	5,625.00
	MBB	B150		Meet with co-counsel and committee members to discuss case strategy and process.	7.50	550.00	4,125.00
	DTM	B150		Attend meeting of CC and Co-counsel to discuss strategy and plan for responsive briefing	7.00	750.00	5,250.00
11/16/21	BAG	B150		Lengthy meeting with co-counsel and committee to distribute workstreams, rolls, and knowledge on science issues.	5.90	975.00	5,752.50
	KEC	B150		Participate in meeting with Creditors Committee.	5.90	750.00	4,425.00
	DLS	B150		Continued Meetings with Talc Creditors Committee and Co-Counsel: Outline Responsive Briefing, Workstreams with Firms.	4.00	750.00	3,000.00



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Date	Init	Task	Actv	Description of Service	Hours	Rate	Amount
	CLJ	B150		Conference with client, re: background, strategy and next steps; conference with co-counsel, re: division of labor and next steps; Conference with co-counsel and clients, re: medical and research history.	5.90	750.00	4,425.00
	TBB	B150		Meeting with committee along with co-counsel regarding strategy, further allocation of work between counsel, document retention and control, scientific issues regarding talcum powder exposure, preliminary injunction extension/defense, motion to dismiss, motions to intervene, and approach and court for further consideration of preliminary injunction.	3.50	975.00	3,412.50
	MBB	B150		Review scientific information presentations to facilitate preparation of introductory brief.	1.90	550.00	1,045.00
	MBB	B150		Meeting with committee members and co-counsel to develop case strategy and litigation plan.	4.00	550.00	2,200.00
	DTM	B150		Meeting with CC and Co-Counsel for continued planning and for science day presentation	5.90	750.00	4,425.00
11/18/21	BAG	B150		Attend committee meeting principally focused on strategy for Monday hearing and early part of case.	2.50	975.00	2,437.50
	KEC	B150		Participate in meeting with the Creditor Committee representatives and counsel regarding upcoming deadlines and hearings.	2.50	750.00	1,875.00
	KB	B150		Committee meeting (Zoom).	2.50	975.00	2,437.50
	TBB	B150		Zoom meeting with committee members on matters being handled along with developing strategy for matters.	2.50	975.00	2,437.50
	TBB	B150		Zoom meeting of counsel for committee regarding allocation of work on matters and sequence of timing of responses to motions to be filed.	.60	975.00	585.00
11/23/21	BAG	B150		Call with the committee about five topics raised by the Trustee or the recent court hearing.	1.70	975.00	1,657.50
	KB	B150		Attend creditors' committee meeting.	1.70	975.00	1,657.50
	TBB	B150		Meeting with talc creditors' committee on progress with case matters.	1.70	975.00	1,657.50
12/01/21	BAG	B150		Meeting with the committee where I cover discovery plans and aspects of the proof on the motion to dismiss.	2.00	975.00	1,950.00
	KEC	B150		Attend Talc Creditor Committee Meeting.	1.70	750.00	1,275.00
	TBB	B150		Participating in zoom meeting with client on preliminary injunction, motion to dismiss and other topics.	1.70	975.00	1,657.50
	TBB	B150		Zoom meeting of counsel regarding issues on upcoming call with committee members and strategy of case.	.50	975.00	487.50

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Date	Init	Task	Actv	Description of Service	Hours	Rate	Amount
12/15/21	TBB	B150		Meetings with co-counsel, committee members, and committee members' individual counsel regarding various issues for 12/15/21 hearing.	.30	975.00	292.50
				<b>Sub-Total of Task</b>		<b>\$ 96,867.50</b>	

**B160 Fee/Employment Applic**

Date	Init	Task	Actv	Description of Service	Hours	Rate	Amount
11/11/21	BAG	B160		Review application for employment.	.80	975.00	780.00
11/12/21	BAG	B160		Edits to retention application.	1.30	975.00	1,267.50
	KB	B160		Review and revise fee application and related pleadings, including long conference with M Burrus re same.	6.70	975.00	6,532.50
12/07/21	TBB	B160		Review of final version of response to UST's email letter requesting additional information and agreements for retention and executing same along with approval of revised order re: retention.	.40	975.00	390.00
12/10/21	TBB	B160		Review of email from UST regarding supplemental declaration and revising proposed order for retention, emails regarding proposed order with UST, and filing of supplemental declaration and revised order.	1.10	975.00	1,072.50
				<b>Sub-Total of Task</b>		<b>\$ 10,042.50</b>	

**B170 Fee/Employment Objections**

Date	Init	Task	Actv	Description of Service	Hours	Rate	Amount
12/06/21	KB	B170		Review draft objection to debtor's employment applications and conference with M Burrus re same.	.20	975.00	195.00
	TBB	B170		Analysis of objection to debtor's retention applications and commenting on issues raised.	.40	975.00	390.00
12/08/21	DLS	B170		Review Objections to Jones Day filed by Trustee and Aylstock. Internal Communications Re Same.	.40	750.00	300.00
12/09/21	MBB	B170		Review U.S. Trustee objection to Debtor's application for retention of Jones Day.	.10	550.00	55.00
	MBB	B170		Review Aylstock objection to Debtor's application to employ Jones Day.	.10	550.00	55.00
				<b>Sub-Total of Task</b>		<b>\$ 995.00</b>	

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**B190 Other Contested Matters**

Date	Init	Task	Actv	Description of Service	Hours	Rate	Amount
11/11/21	TBB	B190		Researching divisive merger statutes histories and intent.	1.20	975.00	1,170.00
11/12/21	BAG	B190		Call with executive committee of TCC on strategy.	.70	975.00	682.50
	BAG	B190		Call with Robert Stark on strategy.	.20	975.00	195.00
	BAG	B190		Review and respond to email traffic on strategy.	.10	975.00	97.50
	BAG	B190		Call with co-counsel at Brown on next moves Re: Motion to Dismiss and P/I	.50	975.00	487.50
	BAG	B190		Calls with Kevin Barrett and then Tom Bennett on next strategy.	.20	975.00	195.00
	BAG	B190		Calls with Johnson and then Selby on staffing Motion to Dismiss and P/I.	.20	975.00	195.00
	MDD	B190		Review/retrieve documents from cases 21-30589 and 21-03032.	3.10	325.00	1,007.50
	MDD	B190		Prepare initial Witness List.	.60	325.00	195.00
	TB	B190		Call with T. Bennett to discuss background of case and receive project to research legislative history of divisive merger and cases relating to same with notes to file.	.30	800.00	240.00
	TB	B190		Review email traffic to proceed with research project after getting clearance from client earlier in afternoon.	.10	800.00	80.00
	TB	B190		Online legal research and review of authorities on Texas divisive merger statute, legislative history, and relevant cases involving same.	3.50	800.00	2,800.00
	DLS	B190		Call with Brian Glasser on Appropriate Staffing for BG Litigation Team and Division of Labor.	.20	750.00	150.00
	DLS	B190		Emails from and to Committee Member's counsel on Motion to Dismiss.	.10	750.00	75.00
	DLS	B190		Review Memorandums Re Motion for Injunction in Imerys Bankruptcy to obtain historical account of J&J's efforts to avoid liability.	.30	750.00	225.00
	KB	B190		Confer with M Burrus re status and assignments coming out of counsel call.	.10	975.00	97.50
	KB	B190		Confer with B Glasser re strategy meeting and staffing.	.10	975.00	97.50
	MBB	B190		Call with BG team re: case strategy.	.30	550.00	165.00
	DTM	B190		Preparation for CC meeting in NY on Nov 15 and 16	1.90	750.00	1,425.00
11/13/21	BAG	B190		Telephone call with team to outline the content of the counter informational brief and the focus of immediate discovery for the motion to dismiss.	1.30	975.00	1,267.50

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Date	Init	Task	Actv	Description of Service	Hours	Rate	Amount
	BAG	B190		Drafting case strategy memorandum no. 1 to the TCC and circulate same for comment.	1.80	975.00	1,755.00
	BAG	B190		Reading materials on the divestiture transaction.	.50	975.00	487.50
	BAG	B190		Reading materials supplied by committee members to orient to science issues.	.90	975.00	877.50
	TB	B190		Online legal research and review of authorities on divisive merger statute.	4.20	800.00	3,360.00
	KEC	B190		Strategy call with Bailey Glasser litigation and bankruptcy team.	1.30	750.00	975.00
	DLS	B190		Review and Calls with Teams Re TCC Memorandum No. 1.	.30	750.00	225.00
	DLS	B190		Emails Re JJCI Liability and Imerys BK.	.10	750.00	75.00
	DLS	B190		Conference Call with BG Team Re litigation strategy and upcoming TCC Meeting.	1.30	750.00	975.00
	KB	B190		Legal research re bad faith dismissal standards in 3d Circuit, finality of order denying dismissal.	.80	975.00	780.00
	KB	B190		Conference call with BG team re litigation strategy and upcoming committee meeting.	1.30	975.00	1,267.50
	CLJ	B190		Conference with legal team, re: strategy for litigation & next client meeting.	1.30	750.00	975.00
	TBB	B190		Conference call regarding allocation of work tasks, discovery going forward and strategy.	1.30	975.00	1,267.50
	TBB	B190		Review of dockets and documents to determine allocation of work scope, for strategy memorandum, and editing of memorandum on same.	1.10	975.00	1,072.50
	MBB	B190		Internal call with BG team re: case strategy.	1.30	550.00	715.00
	DTM	B190		Meeting with BG team re: discovery for Motion to Dismiss	1.30	750.00	975.00
11/14/21	MDD	B190		Receive/review documents related to potential witnesses.	.60	325.00	195.00
	TB	B190		Legal research and review of authorities on Texas divisive merger statute, legislative history, and relevant cases involving same.	7.40	800.00	5,920.00
	DLS	B190		Further Review and Calls with Teams Re TCC Memorandum No. 1.	.20	750.00	150.00
	KB	B190		Confer with Glasser re strategy memo.	.20	975.00	195.00
	TBB	B190		Revising draft memo regarding strategy for committee members including consideration of alternative approaches.	.90	975.00	877.50
	DTM	B190		Meeting with Brian Glasser and David Selby to prepare for CC meetings on various contested matters.	.50	750.00	375.00

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11/15/21	TB	B190		Telephone call with T. Bennett regarding project to prepare sections for motion to dismiss.	.10	800.00	80.00
	TB	B190		Online legal research and review of authorities on Texas divisive merger statute, legislative history, and relevant cases involving same.	4.00	800.00	3,200.00
	KEC	B190		Communication with ESI vendor regarding negotiation of contracts for discovery materials.	.50	750.00	375.00
	KB	B190		Calls with BG team et al. re strategy.	.30	975.00	292.50
	JEK	B190		Update e-mail correspondence file in Filevine.	.40	325.00	130.00
11/16/21	BAG	B190		Review and analyze the Court's order transferring venue to New Jersey.	.20	975.00	195.00
	BAG	B190		Begin listing matters for discovery in connection with the motion to dismiss and reading documents already produced that help with that task.	3.30	975.00	3,217.50
	TB	B190		Online legal research and review of authorities on Texas divisive merger statute, legislative history, and relevant cases involving same.	8.50	800.00	6,800.00
	TB	B190		Email traffic with T. Bennett, B. Glasser, and R. Cox regarding procedural status of NC bankruptcy cases (e.g., DBMP and Aldrich).	.20	800.00	160.00
	TB	B190		Call with Tom Bennett Re: potential attacks on divisive merger.	.30	800.00	240.00
	KB	B190		Confer with K Charonko re documents system and Epiq availability.	.20	975.00	195.00
	CLJ	B190		Review documents from preliminary injunction process in preparation for client meeting on Motion to Dismiss.	.50	750.00	375.00
	CLJ	B190		Review documents from bankruptcy, prior discovery requests, deposition summaries from preliminary injunction process for Motion to Dismiss.	2.00	750.00	1,500.00
	TBB	B190		Drafting and reviewing discovery areas and issues in connection with motion to dismiss.	2.60	975.00	2,535.00
	TBB	B190		Analysis of documents evidencing divisive merger.	1.20	975.00	1,170.00
	MBB	B190		Research re appellate review standards.	.20	550.00	110.00
	JEK	B190		E-mails to and from M. Burrus regarding transfer of case to New Jersey.	.10	325.00	32.50
	JEK	B190		Retrieval of case documents and correspondence.	1.60	325.00	520.00
	JEK	B190		Research corporate filings and e-mail to B. Glasser	1.10	325.00	357.50
11/17/21	BAG	B190		Continued review of documents to determine custodians for discovery and relevant areas of inquiry for motion to dismiss.	3.40	975.00	3,315.00

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	MDD	B190		Review of 10.11.21 memo to review/update list of potential witnesses with what they know.	2.10	325.00	682.50
	TB	B190		Review of authorities and drafting of insert on divisional merger statute, based on the language of the statute, legislative history, and other sources of legislative intent.	8.10	800.00	6,480.00
	DLS	B190		Receipt and Review of Email and Attachments from Joe Satterley Re Sanctions issues.	.30	750.00	225.00
	KB	B190		Review NJ decision regarding fraud claims and email correspondence with M Burrus re same.	.30	975.00	292.50
	KB	B190		Email correspondence with B Glasser re roles and responsibilities in context of status conference.	.10	975.00	97.50
	KB	B190		Confer with M Burrus re document requests and productions and response to same.	.30	975.00	292.50
	KB	B190		Confer with Burrus and conference and email correspondence with K Charonko re DISCO contract and communications with committee re same.	.40	975.00	390.00
	BJM	B190		Conferred with Katherine Charonko Via Telephone Re: Procedural History and Discovery Plan.	.20	550.00	110.00
	TBB	B190		Review of further research on Texas Business Organization Code divisive merger provisions in connection with motion to dismiss.	.60	975.00	585.00
	TBB	B190		Review and analysis of secondary source authority regarding Texas Business Organizations Code relating to divisive mergers.	1.20	975.00	1,170.00
	JEK	B190		Retrieval of case document and correspondence.	1.20	325.00	390.00
11/18/21	BAG	B190		Continued work outlining custodians for discovery and potential witnesses on motion to dismiss.	1.20	975.00	1,170.00
	BAG	B190		Drafting a master list of focused discovery for the motion to dismiss, including identifying relevant custodians, documents to request and witnesses we need from our side who are not adverse and witnesses we may depose from J&J companies.	4.30	975.00	4,192.50
	BAG	B190		Email traffic with co-counsel and committee on issues arising out of the meet and confer process.	.20	975.00	195.00
	TB	B190		Review of authorities and drafting of insert on potential Texas divisional merger statute, finalized draft and circulated same for review and comment.	7.20	800.00	5,760.00
	KEC	B190		Working with ESI project for formalization of platform and analysis of previous document productions in adversary proceeding.	.90	750.00	675.00

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	KEC	B190		Analysis of and working with LTL Management discovery productions from Preliminary Injunction.	.80	750.00	600.00
	BJM	B190		Conferred with Katherine Charonko Via Telephone Re: Discovery and Document Management.	.20	550.00	110.00
	TBB	B190		Further review and analysis of legislative history for Texas relating to divisive mergers.	.50	975.00	487.50
	TBB	B190		Review of revised draft of discovery requests for use in motions dealing with dismissal.	.50	975.00	487.50
	JEK	B190		Retrieval of case documents and correspondence.	1.80	325.00	585.00
	DTM	B190		T/C with Brian Glasser and David Selby re: mediation of contested matters and communications with CC re: same.	.40	750.00	300.00
11/19/21	BAG	B190		Continued work identifying potential custodians for discovery and outlining potential pieces of proof.	1.60	975.00	1,560.00
	TB	B190		Additional research and drafting on argument concerning the divisional merger statute, including work on drafting an appropriate facts section for inclusion in this overall argument about the Texas divisional merger statute; circulated revised draft for review and comment.	6.80	800.00	5,440.00
	KEC	B190		Analysis and work with discovery materials for use during early motion practice and discovery phase.	.90	750.00	675.00
	KEC	B190		Strategy communication regarding supplemental discovery phase for Motion to Dismiss.	.70	750.00	525.00
	KEC	B190		Analysis of and working with LTL Management discovery productions from Preliminary Injunction for Motion to Dismiss.	.70	750.00	525.00
	KEC	B190		Setting of credentials for Creditor Committee attorneys related to discovery productions.	.40	750.00	300.00
	TLC	B190		Discovery strategy conference call.	.70	550.00	385.00
	KB	B190		Email correspondence and call with T Bennett re status with committee on scope of work on Motion to Dismiss.	.20	975.00	195.00
	BJM	B190		Conferred with Katherine Charonko and Tony Clackler Via Zoom to Develop Strategy in Preparation for Discovery.	.70	550.00	385.00
	BJM	B190		Reviewed Documents Filed in Conjunction with North Carolina Bankruptcy Proceedings in Preparation for Discovery.	1.10	550.00	605.00
	BJM	B190		Reviewed information from Katherine Charonko and Rachel Morse Re: Establishment of DISCO Review Library and Ingest of Documents from Preliminary Injunction Hearing in Preparation for Discovery.	.10	550.00	55.00

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	TBB	B190		Revising of draft of discovery requests for motion to dismiss.	.80	975.00	780.00
	TBB	B190		Research on issues relating to Motion to Dismiss with respect to assets and liabilities.	1.30	975.00	1,267.50
	TBB	B190		Call with T. Basdekis on additions and with M. Burrus on supplemental research on Motion to Dismiss.	.10	975.00	97.50
	TBB	B190		Revising Texas divisive merger portion of motion to dismiss.	1.10	975.00	1,072.50
	TBB	B190		Research on North Carolina's statutes governing mergers.	1.10	975.00	1,072.50
	MBB	B190		Confer with T. Bennett re: legal research to facilitate preparation of motion to dismiss.	.10	550.00	55.00
	JEK	B190		Retrieval of case document and correspondence.	.50	325.00	162.50
11/20/21	BAG	B190		Continued work reviewing documents used to date to identify custodians, think about potential witnesses we may need and draft discovery, all for the motion to dismiss.	2.10	975.00	2,047.50
	BAG	B190		Reading first day hearing transcript from NC to see how LTL will characterize matters relating to contested matters.	2.50	975.00	2,437.50
	TB	B190		Continued drafting and review of authorities on insert regarding the Texas divisional merger statute; revisions to and reworking of facts section; circulated new, revised draft late on Saturday night for review and comment.	7.00	800.00	5,600.00
	KEC	B190		Strategy communication regarding drafting of Motion to Withdrawal Reference.	.70	750.00	525.00
	KB	B190		Email correspondence with Glasser re 524(g) issues, including review of same.	.10	975.00	97.50
	TBB	B190		Revising and restructuring Texas divisive merger portion of motion to dismiss..	1.70	975.00	1,657.50
11/21/21	BAG	B190		Additions to discovery list for motion to dismiss and email traffic with Cary Joshi on same.	.50	975.00	487.50
	BAG	B190		Read and reread the Funding Agreement and thinking through associated arguments in respect of the motion to dismiss and beyond.	.60	975.00	585.00
	BAG	B190		Read transcripts of prior first day hearing and injunction hearing to continue to see how the debtor characterizes matters Re: Motion to Dismiss and Preliminary Injunction.	1.70	975.00	1,657.50



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Date	Init	Task	Actv	Description of Service	Hours	Rate	Amount
	TB	B190		Legal research and review of authorities on whether mergers are effective under Texas, NC, or other general common law.	2.40	800.00	1,920.00
	KEC	B190		Continued work on discovery document analysis of LTL materials regarding scoping of RFP responses.	1.10	750.00	825.00
	KEC	B190		Continued communication of revisions and drafts of Motion to Withdrawal Reference.	.40	750.00	300.00
	DLS	B190		Review and Edit Outline for 11/22 Hearing on Motion to Dismiss issues.	.50	750.00	375.00
	TLC	B190		Analyzed bates error on document spreadsheet tracker. Searched for and analyzed certain merger/financial documents. Downloaded documents and provided them to Kate.	4.20	550.00	2,310.00
	TBB	B190		Revising restructured divisive merger portion of motion to dismiss.	1.10	975.00	1,072.50
	MBB	B190		Research to facilitate preparation of motion to dismiss.	4.00	550.00	2,200.00
	MBB	B190		Review and summarize terms of funding agreement for B. Glasser.	1.30	550.00	715.00
11/22/21	BAG	B190		Close read of SGL case to think though issues that may be raised in today's hearing.	.50	975.00	487.50
	BAG	B190		Finish edits to initial list of possible deponents and custodians of records as well as thoughts on witnesses for the motion to dismiss hearing, and circulate to co-counsel and the committee.	.40	975.00	390.00
	TB	B190		Drafted updated insert for potential inclusion into motion to dismiss briefing and circulated same for review and comment.	2.00	800.00	1,600.00
	KEC	B190		Call with C. Joshi regarding discovery for drafting Motion to Dismiss.	.30	750.00	225.00
	KEC	B190		Call with B. McAllister regarding drafting of Motion to Dismiss discovery.	.10	750.00	75.00
	KEC	B190		Working on updates regarding previous document RFPs from Preliminary Injunction and circulation of information to working attorneys.	.70	750.00	525.00
	KEC	B190		Working on continued discovery projects related to exhibits used during preliminary injunction hearings.	.70	750.00	525.00
	KEC	B190		Communication with Brown Rudnick regarding discovery conference call.	.10	750.00	75.00
	DLS	B190		Call with Brian Glasser and Todd Mathews following Hearing: Strategy and Plan going forward.	.50	750.00	375.00
	DLS	B190		Review draft of custodian of records and witness list to propose with Debtor. In Firm Communications Re Same.	.30	750.00	225.00

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	DLS	B190		Email and Phone Communications Re CEO Gorsky Deposition.	.20	750.00	150.00
	DLS	B190		Communications with Leigh O'Dell, her staff, and BG team Re Preparation for MTD.	.20	750.00	150.00
	TLC	B190		Read, analyzed, drafted attorney work product on Ch. 11 bankruptcy hearing transcript 10.20.21.	4.90	550.00	2,695.00
	TLC	B190		Read, analyzed, and created attorney work product for transcript of Ch. 11 hearing on 10.22.21.	1.50	550.00	825.00
	KB	B190		Review draft brief on motion to withdraw the reference.	.20	975.00	195.00
	KB	B190		Confer with M Burrus re research on merger claims.	.20	975.00	195.00
	CLJ	B190		Prepare discovery plan for motion to dismiss.	1.20	750.00	900.00
	TBB	B190		Review of additional discovery areas for motion to dismiss along with review of already produced documents relating to motion to dismiss issues.	1.20	975.00	1,170.00
	MBB	B190		Review correspondence from T. Basdekis re: divisional merger research.	.10	550.00	55.00
	JEK	B190		Retrieval of case documents and correspondence.	.60	325.00	195.00
	RRB	B190		Calls and email exchanges re assignment on reviewing bankruptcy cases dismissed for bad faith filings; review of cases dismissing bankruptcy cases for bad faith filings	1.80	850.00	1,530.00
	JGT	B190		Exchange e-mails and review SGL case and telephone conference with Bell to develop strategy for proceeding forward on request by Mr. Glasser relating to surveying case law relating to dismissal of bankruptcies for bad faith.	.80	850.00	680.00
	JGT	B190		Continued analysis of approach to take in connection with the bad faith project and telephone conference regarding same.	1.50	850.00	1,275.00
	JGT	B190		Begin reviewing case law regarding dismissal of Chapter 11 bankruptcies and completing spread sheet Re: same.	1.50	850.00	1,275.00
	JSC	B190		Telephone call with Robert Bell and John Turner re chart of cases needed re bad faith dismissal and strategy for accomplishing same.	.40	550.00	220.00
	JSC	B190		Create template chart for bad faith dismissal research project and circulate draft of same to group for use.	.60	550.00	330.00
	JSC	B190		Review citing headnotes print out from westlaw and narrow list of cases for chart to those granting dismissal not already included on citing references list from seminal case.	.70	550.00	385.00
	JSC	B190		Circulate list of additional cases from headnotes references print out to group for review.	.20	550.00	110.00

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	DTM	B190		T/C with Brian Glasser and David Selby to discuss Strategy and action items for contested matters.	.50	750.00	375.00
11/23/21	BAG	B190		Call re: walking the committee through a proposed briefing and discovery schedule, a list of possible deponents and a list of possible witnesses, with commentary.	1.00	975.00	975.00
	BAG	B190		Call assigning drafting of an agreement having to do with the litigation to Turner.	.10	975.00	97.50
	BAG	B190		Email assigning review of a specific class of documents to Massey lawyer.	.10	975.00	97.50
	BAG	B190		Finish up and circulate to core committee counsel for review and comment my proposed set of requests for the production of documents in respect of the upcoming hearing on the motion to dismiss.	1.40	975.00	1,365.00
	BAG	B190		Edit Texas Two Step insert for motion to dismiss and circulate same to Brown Rudnick for inclusion in first draft to committee.	.30	975.00	292.50
	KEC	B190		Continued work in discovery library to grant access to committee representatives and continued work on analysis of LTL productions.	.90	750.00	675.00
	KEC	B190		Communications with committee members regarding filings, discovery and updates.	.50	750.00	375.00
	KEC	B190		Call with Brown Rudnick and Otterbourg regarding ESI and discovery preparation for Motion to Dismiss discovery.	.30	750.00	225.00
	KEC	B190		Continued analysis and work with preliminary injunction materials for preparation in discovery phase of motion to dismiss.	1.70	750.00	1,275.00
	KEC	B190		Strategy communication with committee representatives regarding litigation discovery for motion to dismiss.	.70	750.00	525.00
	KEC	B190		Call with T. Clackler and B. McAllister regarding discovery.	.20	750.00	150.00
	KEC	B190		Call with Creditor Committee regarding motion to dismiss discovery.	1.00	750.00	750.00
	DLS	B190		Email Re old JJCI from Chris Tisi.	.10	750.00	75.00
	DLS	B190		Review Information from Bestwall bankruptcy relevant to LTL issues.	.20	750.00	150.00
	DLS	B190		Further Communications with Leigh O'Dell, her staff, and BG team Re Preparation for MTD.	.50	750.00	375.00
	TLC	B190		Read, analyzed, and created attorney work product for Chapter 11 Hearing Transcript 10.22.21.	1.20	550.00	660.00

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	TLC	B190		Read, analyzed, and created attorney work product for Chapter 11 Hearing Transcript 10.25.21.	.60	550.00	330.00
	TLC	B190		Read, analyzed, and created attorney work product for Chapter 11 Hearing Transcript 11.4.21.	5.20	550.00	2,860.00
	TLC	B190		Conference call concerning Discovery Review Platform.	.30	550.00	165.00
	TLC	B190		Created document spreadsheet tracker for certain types of documents. Entered information about a document into spreadsheet.	.20	550.00	110.00
	TLC	B190		Read, analyzed, and created attorney work product for Chapter 11 Hearing Transcript 11.5.21.	.70	550.00	385.00
	KB	B190		Review article re Texas Two Step.	.10	975.00	97.50
	KB	B190		Review revised brief on withdrawal of the reference.	.20	975.00	195.00
	KB	B190		Confer with M Burrus re discovery-related issues.	.30	975.00	292.50
	KB	B190		Discovery call with co-counsel.	1.00	975.00	975.00
	CLJ	B190		Review all previous discovery requests and cross reference with MTD discovery plan.	1.80	750.00	1,350.00
	BJM	B190		Reviewed Documents Exchanged Between Katherine Charonko and Brian Glasser Re: Document Review.	.30	550.00	165.00
	TBB	B190		Meeting of counsel to analyze discovery issues relative to motion to dismiss including depositions and document productions.	1.10	975.00	1,072.50
	TBB	B190		Review and revising of draft of motion to dismiss portion on Texas' divisive merger statute along with supplemental research on effectiveness of actions taken in violation of legislative intent.	.40	975.00	390.00
	MBB	B190		Confer with C. Joshi re: debtor's schedules and other discovery.	.30	550.00	165.00
	JEK	B190		Retrieval of case documents and correspondence.	.70	325.00	227.50
	JEK	B190		Retrieval of Common Interest Agreements and e-mail to J. Turner.	.40	325.00	130.00
	RRB	B190		Review and analyze cases dismissing bankruptcy filings for bad faith to aid in discovery in litigation involving bankruptcy filing	1.80	850.00	1,530.00
	JGT	B190		Continue reviewing case law regarding instances where courts have dismissed Chapter 11 cases for bad faith and draft entries into the bad faith factors chart.	3.50	850.00	2,975.00
	JGT	B190		Telephone call with Bell regarding approach to take in connection with the bad faith case law review.	.30	850.00	255.00
	JSC	B190		Read and review cases dismissing chapter 11 petitions on bad faith grounds and draft brief of analysis of such cases for case chart document of bad faith factors being compiled to anticipate discovery needs	8.20	550.00	4,510.00

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11/24/21	BAG	B190		Review and then circulate our proposed chart of the divisive merger transactions for comment and improvement as well as email traffic on same.	.30	975.00	292.50
	BAG	B190		Review email traffic and documents delivered from co-counsel on potential witnesses or discovery related to MTD, as well as updating the witness list and first set of discovery questions and shipping it to the committee for review and comment.	2.10	975.00	2,047.50
	BAG	B190		Reviewing prior testimony of Kim in deposition and in injunction hearing to outline areas for further examination.	1.10	975.00	1,072.50
	KEC	B190		Analysis and collection of documents for B. Glasser related to drafting of Witness List for Motion to Dismiss discovery.	.60	750.00	450.00
	KEC	B190		Communication and analysis of revisions and drafts of motion to dismiss working custodian list.	.50	750.00	375.00
	TLC	B190		Read, analyzed, and created attorney work product for LTL proceedings 11.5.21.	3.60	550.00	1,980.00
	TLC	B190		Read, analyzed, and created attorney work product for LTL proceedings 11.10.21.	1.80	550.00	990.00
	KB	B190		Review docket and pleadings filed.	.10	975.00	97.50
	KB	B190		Email correspondence with J Turner re common interest agreement.	.10	975.00	97.50
	KB	B190		Review Texas two-step insertion and email correspondence with M Burrus re same.	.20	975.00	195.00
	BJM	B190		Exchanged Emails with Todd Mathews and Katherine Charonko Re: Legal Research in Preparation for Document Review.	.10	550.00	55.00
	TBB	B190		Analysis of Kim Declaration with respect to exhibits to motion to dismiss and revising exhibit on corporate restructurings.	1.70	975.00	1,657.50
	TBB	B190		Analysis of initial operating report regarding treatment of items forming part of motion to dismiss.	.30	975.00	292.50
	JEK	B190		Prepare word version of common interest agreement and e-mail to J. Turner.	.80	325.00	260.00
	RRB	B190		Review and analysis of bankruptcy cases dismissed for bad faith to aid in discovery	2.60	850.00	2,210.00
	JGT	B190		Review of background material regarding legal issues in the case for preparation for drafting Common Interest Agreement.	1.50	850.00	1,275.00
	JGT	B190		Draft and revise Common Interest Agreement and exchange e-mails regarding same.	1.90	850.00	1,615.00

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	JGT	B190		Continue reviewing case law regarding bad faith based dismissal of bankruptcies.	.50	850.00	425.00
11/25/21	BAG	B190		Reading testimony from the prior hearings with an eye toward the motion to dismiss issues.	1.40	975.00	1,365.00
	BAG	B190		Review and respond to email traffic on the witness list as well as discovery draft I circulated 11/24/21.	.30	975.00	292.50
	KEC	B190		Strategy communications with counsel for the Creditor Committee regarding discovery drafting.	.60	750.00	450.00
	KEC	B190		Analysis of draft motion to dismiss discovery and witness list revisions in preparation for Committee call.	.90	750.00	675.00
	TBB	B190		Analysis of proposed discovery for motion to dismiss including selection of deponents, document production, and prior discovery done in injunction adversary proceeding filed by Johnson & Johnson, and suggested modifications to each.	.70	975.00	682.50
	TBB	B190		Analysis of case law on effectiveness of corporate actions.	.70	975.00	682.50
11/26/21	BAG	B190		Call with co-counsel to approve final set of first discovery and identify early deponents and custodians of records for same.	1.90	975.00	1,852.50
	BAG	B190		Final edits to and then circulate to the committee and agreement for them to review and approve discovery.	.20	975.00	195.00
	BAG	B190		Continued review of prior hearings with eye toward evidence for motion to dismiss.	1.30	975.00	1,267.50
	KEC	B190		Drafting and research related to Discovery Plan protocol and ESI production language.	2.70	750.00	2,025.00
	KEC	B190		Participate in call with counsel for the Creditor Committee regarding discovery.	1.90	750.00	1,425.00
	KEC	B190		Communication with counsel for the Creditor Committee regarding discovery.	.80	750.00	600.00
	CLJ	B190		Review recent discovery plan and Conference with co-counsel, re: MTD discovery plan.	3.40	750.00	2,550.00
	TBB	B190		Further analysis of case law actions taken in violation of a statute and standing.	1.70	975.00	1,657.50
	TBB	B190		Determining who to depose, interrogatories, document production, schedule for discovery, service and responses, entities to be subpoenaed, esi agreement, and revisions to discovery requests.	1.90	975.00	1,852.50
	JGT	B190		Finish reviewing my portion of the cases dismissing bankruptcy proceedings for bad faith and enter the factual support for each case on spread sheet requested by Glasser.	1.80	850.00	1,530.00

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11/27/21	BAG	B190		Continued review of transcripts of prior hearings as well as associated exhibits to prepare for depositions in motion to dismiss adversary.	5.50	975.00	5,362.50
	KEC	B190		Finalize initial draft of Discovery Plan protocol and ESI production language for circulation to co-lead counsel and special counsel for Committee.	1.70	750.00	1,275.00
	KEC	B190		Communication with attorneys for Creditors Committee regarding discovery drafting.	.70	750.00	525.00
	KEC	B190		Revisions and analysis to definitions of discovery requests draft and analysis of protocol language.	1.90	750.00	1,425.00
	TBB	B190		Review of esi protocols for discovery for motion to dismiss along with revised identified custodians listing for depositions and document production and discovery for Middlesex Assurance.	.80	975.00	780.00
	TBB	B190		Analysis of case law on setting aside mergers.	1.60	975.00	1,560.00
	RRB	B190		Review and analysis of bankruptcy cases that were dismissed for bad faith to aid is discovery strategy.	1.90	850.00	1,615.00
11/28/21	BAG	B190		Edit, then circulate, revised first set of request for the production of documents for use in the motion to dismiss hearing.	.50	975.00	487.50
	BAG	B190		Talking through certain legal issues with Tom Bennett.	.10	975.00	97.50
	BAG	B190		Edits to first draft of motion to dismiss and circulate same.	1.90	975.00	1,852.50
	BAG	B190		Read and comment on Bennett's comments on the first draft of the motion to dismiss.	.30	975.00	292.50
	BAG	B190		Continued work on first round of discovery to Debtors, including requests for production, interrogatories and requests for admission.	1.40	975.00	1,365.00
	BAG	B190		Reading through exhibits admitted at injunction hearing with an eye toward use in motion to dismiss as well as depositions associated with the motion to dismiss.	3.20	975.00	3,120.00
	KEC	B190		Communications and analysis of revisions to discovery and witness lists.	1.20	750.00	900.00
	KEC	B190		Analysis of Motion to Dismiss revisions.	1.60	750.00	1,200.00
	KB	B190		Review and revise draft motion to dismiss.	2.50	975.00	2,437.50
	CLJ	B190		Review correspondence from legal team and prepare custodian list.	1.60	750.00	1,200.00
	TBB	B190		Review and revising of interrogatories, requests for production, and admissions for motion to dismiss.	1.60	975.00	1,560.00
	TBB	B190		Analysis of caselaw on mergers and legitimate corporate purposes therewith.	1.10	975.00	1,072.50

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Talc Creditors Committee  
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Date	Init	Task	Actv	Description of Service	Hours	Rate	Amount
	TBB	B190		Review and analysis of draft of motion to dismiss along with making suggested revisions thereto.	1.80	975.00	1,755.00
	RRB	B190		Review and analysis of cases dismissed for bad faith to determine the relevant factors the court applied to aid in discovery.	5.00	850.00	4,250.00
11/29/21	BAG	B190		Review K. Barrett's edits and then circulate same to Motion to Dismiss team.	.40	975.00	390.00
	BAG	B190		Review and respond to email traffic among committee and firms on discovery issues.	.30	975.00	292.50
	BAG	B190		Email traffic associated with final tweaks to list of identified custodians and the first set of discovery, including edits to same.	.90	975.00	877.50
	BAG	B190		Call with Dan Stolz on local procedure.	.10	975.00	97.50
	BAG	B190		Meet and confer with Jones Day on discovery and schedule for motion to dismiss and follow up calls and emails with Joshi, Jones and then Kate on same.	.70	975.00	682.50
	BAG	B190		Continued review of exhibits and depositions used in PI hearing with a view toward possible use in motion to dismiss.	3.70	975.00	3,607.50
	BAG	B190		Email with Jones Day and my team on met and confer issues.	.20	975.00	195.00
	TB	B190		Call with T. Bennett to revise scope of legal research project on mergers being effective or not.	.80	800.00	640.00
	KEC	B190		Call with B. McAllister regarding motion to dismiss discovery and drafting of review protocols.	.60	750.00	450.00
	KEC	B190		Continued work on discovery projects related to preparation for motion to dismiss discovery phase.	1.90	750.00	1,425.00
	KEC	B190		Revisions and analysis of Discovery Plan draft in preparation for meet and confer with Jones Day.	2.90	750.00	2,175.00
	DLS	B190		Review and revising Motion To Dismiss.	.50	750.00	375.00
	DLS	B190		In Firm Communications Re Additional Custodians.	.20	750.00	150.00
	DLS	B190		Review Order of Proof draft. Communications Re Same.	.20	750.00	150.00
	TLC	B190		Read, analyzed, and created attorney work product for Debtor's Complaint for Declaratory and injunctive Relief for Motion to Dismiss.	.50	550.00	275.00
	TLC	B190		Read, analyzed, and created attorney work product for MDL PSC's Memorandum of Law in Opposition to Automatic Stay and TRO for Motion to Dismiss.	.50	550.00	275.00
	TLC	B190		Read, analyzed, and created attorney work product for Order Granting PI.	.30	550.00	165.00
	TLC	B190		Read, analyzed, and created attorney work product for LTL's Informational Brief.	2.40	550.00	1,320.00



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Date	Init	Task	Actv	Description of Service	Hours	Rate	Amount
	TLC	B190		Read, analyzed, and created attorney work product for Declaration by John Kim.	.40	550.00	220.00
	KB	B190		Review and revise motion to dismiss and email correspondence with Glasser and Bennett re same.	1.90	975.00	1,852.50
	KB	B190		Confer with Glasser re motion to dismiss.	.10	975.00	97.50
	KB	B190		Email correspondence with B Glasser re discovery responses.	.50	975.00	487.50
	CLJ	B190		Prepare discovery for motion to dismiss.	4.20	750.00	3,150.00
	BJM	B190		Conferred with Katherine Charonko Via Telephone and Email Re: Document Review, Coding Panel, and Proposed Discovery Plan in Conjunction with Discovery.	.70	550.00	385.00
	BJM	B190		Reviewed and Revised Proposed Discovery Plan.	1.80	550.00	990.00
	BJM	B190		Reviewed Court Filings and Hearing Transcripts in Preparation for Discovery.	2.60	550.00	1,430.00
	TBB	B190		Review, analysis, and drafting of revisions to motion to dismiss along with revisions to graphic on structure of how divisive merger was constructed.	2.30	975.00	2,242.50
	MBB	B190		Confer with C. Joshi re: subpoenas.	.10	550.00	55.00
	JEK	B190		Prepare list of document custodians and e-mail to C. Joshi.	.40	325.00	130.00
	RRB	B190		Review of chart re dismissal of cases for bad faith and review of brief to dismiss petition for bad faith	.90	850.00	765.00
	RRB	B190		Review of legal issues re demand letter, researched the same and began drafting letter; email exchanges re same	1.40	850.00	1,190.00
	JGT	B190		Review and analysis of background materials for Motion to Dismiss and Common Interest Agreement	3.70	850.00	3,145.00
	JSC	B190	A103	Read and review case brief summaries prepared by Robert Bell and John Turner for bad faith dismissal chart.	.60	550.00	330.00
	JSC	B190	A103	Incorporate Robert Bell and John Turner case briefs into bad faith dismissal case chart draft and format and finalize chart for consistency.	1.30	550.00	715.00
	JSC	B190	A103	Read and review working draft of motion to dismiss brief.	.90	550.00	495.00
	JSC	B190	A103	Read, review, and draft summary case briefs of bad faith dismissal cases cited in motion to dismiss brief that were not already included in case chart.	2.10	550.00	1,155.00
	JSC	B190	A103	Send finalized working draft of bad faith dismissal case chart to Robert Bell, John Turner, and Cari Joshi for review and comment.	.20	550.00	110.00

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Date	Init	Task	Actv	Description of Service	Hours	Rate	Amount
11/30/21	BAG	B190		Meet and confer with Jones Day and then associated follow up on my side with Cary and others on first deponents and Identified Custodians.	.70	975.00	682.50
	BAG	B190		Read documents in the closing binder for the 2021 Corporate Reorganization with a view toward depositions.	2.60	975.00	2,535.00
	BAG	B190		Calls and email traffic with Joshi on discovery and subpoenas.	.30	975.00	292.50
	BAG	B190		Draft and circulate email on our side on meet and confer.	.20	975.00	195.00
	TB	B190		Legal research and review of authorities on mergers under Texas, NC, and other law.	4.50	800.00	3,600.00
	KEC	B190		Revisions and finalization of Discovery Plan draft, including incorporation of comments and notes from members of the Committee counsel.	2.40	750.00	1,800.00
	KEC	B190		Call with Arnold Blair of Brown Rudnick regarding revisions to Discovery Plan.	.40	750.00	300.00
	KEC	B190		Meet and Confer call with Jones Day regarding motion to dismiss discovery phase.	.40	750.00	300.00
	KEC	B190		Call with T. Clackler regarding drafting of document review protocols for motion to dismiss discovery phase.	.20	750.00	150.00
	KEC	B190		Communications regarding meet and confer with Jones Day and discovery phase.	.40	750.00	300.00
	KEC	B190		Call with C. Joshi regarding subpoena service for motion to dismiss discovery.	.20	750.00	150.00
	KEC	B190		Communication with co-counsel regarding document review question on discovery materials.	.10	750.00	75.00
	TLC	B190		Read and analyzed produced documents, categorized documents, added information to document tracker spreadsheet.	8.20	550.00	4,510.00
	TLC	B190		Conference call with Kate about categorizing produced documents.	.10	550.00	55.00
	KB	B190		Confer with J Turner re background and status of various matters relating to motion to dismiss.	.50	975.00	487.50
	KB	B190		Review revised motion to dismiss as sent to the committee.	.30	975.00	292.50
	KB	B190		Confer with M Burrus re discovery relating to motion to dismiss.	.30	975.00	292.50
	CLJ	B190		Prepare subpoenas and update discovery requests for motion to dismiss.	3.80	750.00	2,850.00

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Date	Init	Task	Actv	Description of Service	Hours	Rate	Amount
	BJM	B190		Conferred with Katherine Charonko Via Telephone Re: Revisions to Proposed Discovery Plan and Document Review Coding Panel.	.20	550.00	110.00
	BJM	B190		Reviewed Emails Between Katherine Charonko and Anne Swift Re: Document Review.	.10	550.00	55.00
	BJM	B190		Reviewed Email from Katherine Charonko Re: Hearing Transcripts.	.10	550.00	55.00
	BJM	B190		Reviewed Federal Rules of Bankruptcy Procedure, Court Filings, and Hearing Transcripts for Discovery matters and scope.	3.30	550.00	1,815.00
	TBB	B190		Review and analysis of 11/30/21 morning draft of revised motion to dismiss along with making suggested further revisions.	2.10	975.00	2,047.50
	TBB	B190		Review of Texas and North Carolina statutory provisions and case law regarding demands by shareholders and creditors for actions.	1.30	975.00	1,267.50
	TBB	B190		Review and analysis of 11/30/21 evening draft of motion to dismiss incorporating multiple revisions sought by various parties and responding thereto.	.50	975.00	487.50
	MBB	B190		Review draft ESI protocol.	.60	550.00	330.00
	MBB	B190		Review and comments on proposed motion to dismiss.	.30	550.00	165.00
	JEK	B190		Draft subpoenas for the production of documents and e-mail to C. Joshi	1.80	325.00	585.00
	JEK	B190		Draft subpoenas for production of documents and e-mail to C. Joshi.	1.60	325.00	520.00
	RRB	B190		Review of Tx law on derivative demands for LLC's; revised demand letter; email exchanges with T Bennett and J Turner re same	1.60	850.00	1,360.00
	JGT	B190		Telephone call with Kevin Barrett regarding background facts and issues.	.50	850.00	425.00
12/01/21	BAG	B190		Edit and recirculate to our side a meet and confer communication on discovery as well as receive comments on same and circulate to Jones Day.	.30	975.00	292.50
	BAG	B190		Think through testimony of an expert and make some notes on same.	.30	975.00	292.50
	BAG	B190		Outlining questions for Goodright deposition.	2.70	975.00	2,632.50
	BAG	B190		Edits to subpoenas and calls with Joshi on same.	.40	975.00	390.00
	BAG	B190		Read through redline of ESI protocol and comment back to Kate on same.	.30	975.00	292.50
	KEC	B190		Revision of ESI protocol following redline from Jones Day with circulation internally for approval and comments prior to service on defense.	2.70	750.00	2,025.00

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Date	Init	Task	Actv	Description of Service	Hours	Rate	Amount
	DLS	B190		Communications Re RFAs, RPD, and INT to Debtor.	.30	750.00	225.00
	DLS	B190		Communications with BG Team, including, John Turner, Robert Bell, and Brian Glasser Re Tasks for MTD.	.20	750.00	150.00
	TLC	B190		Discovery--read and analyzed produced documents. Categorized documents and added information to the document tracker spreadsheet.	4.40	550.00	2,420.00
	KB	B190		Confer with Burrus re Committee calls.	.10	975.00	97.50
	KB	B190		Review final motion to dismiss.	.30	975.00	292.50
	KB	B190		Confer with M Burrus, including conference with B Glasser, re motion to dismiss.	1.30	975.00	1,267.50
	CLJ	B190		Prepare third-party subpoenas; review discovery requests; finalize discovery requests; confer with co-counsel, re: discovery requests; finalize and serve discovery requests.	5.10	750.00	3,825.00
	BJM	B190		Conferred with Katherine Charonko Via Telephone Re: Review of Court Documents and Bankruptcy Rules in Preparation for Discovery.	.10	550.00	55.00
	TBB	B190		Review of additional modifications to motion to dismiss along with email regarding correcting modifications.	.30	975.00	292.50
	MBB	B190		Motion to dismiss: Review and prepare comment on motion to dismiss.	.90	550.00	495.00
	MBB	B190		Confer with committee counsel re: various case filings and discovery issues.	.50	550.00	275.00
	MBB	B190		Motion to dismiss: continue review of co-counsel comments to motion to dismiss.	1.40	550.00	770.00
	JEK	B190		Retrieval of case document and correspondence.	.60	325.00	195.00
	JEK	B190		E-mails to and from C. Joshi regarding subpoenas for depositions and production of depositions from third parties.	.40	325.00	130.00
	JEK	B190		Draft subpoenas for depositions and production of depositions from Janssen, JJCI and Alex Gorsky	.80	325.00	260.00
	JEK	B190		Upload exhibits to witness folders.	.50	325.00	162.50
	JEK	B190		E-mails to and from C. Joshi regarding form for Affidavit of Custodian of Records.	.40	325.00	130.00
	RRB	B190		Review and respond to emails re discovery strategy; review of discovery requests propounded on LTL; email exchanges re documents to review to plan discovery plan	1.00	850.00	850.00
12/02/21	BAG	B190		Edit and recirculate Purple Strategies subpoena.	.30	975.00	292.50
	BAG	B190		Drafting and then emailing answer to the committee they asked for on yesterday's call.	.20	975.00	195.00

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Date	Init	Task	Activ	Description of Service	Hours	Rate	Amount
	BAG	B190		Call with Kate Charonko and Danielle D'Aquila about ESI protocol negotiations.	1.00	975.00	975.00
	BAG	B190		Meet and confer with Jones Day.	.20	975.00	195.00
	BAG	B190		Reading through credentials of potential expert witnesses.	2.80	975.00	2,730.00
	BAG	B190		Edits to and circulate proposed PWC subpoena.	.30	975.00	292.50
	BAG	B190		Continued preparation for the deposition of Goodright.	2.60	975.00	2,535.00
	KEC	B190		Communication regarding the ESI protocol drafting and revisions.	.20	750.00	150.00
	KEC	B190		Continued revisions to draft ESI protocol and circulation to defense counsel regarding revisions.	1.40	750.00	1,050.00
	KEC	B190		Call with Creditor Committee Counsel regarding ESI protocol revisions.	.50	750.00	375.00
	KEC	B190		Communication on discovery requests and analysis of draft subpoenas.	.90	750.00	675.00
	KEC	B190		Begin drafting and revisions of document analysis protocol.	.70	750.00	525.00
	DLS	B190		Preparation for Depositions including Review of Exhibits to Debtor's Initial Pleadings and Insurance of Documents, Prepare Deposition Outline based on Insurance Documents.	6.50	750.00	4,875.00
	TLC	B190		Analyzed bankruptcy law as it pertains to certain discovery issues in adversary proceedings.	.60	550.00	330.00
	TLC	B190		Analyzed Draft ESI Protocol.	.80	550.00	440.00
	TLC	B190		Call with KEC about coding memo project.	.10	550.00	55.00
	TLC	B190		Drafting of coding memo.	2.60	550.00	1,430.00
	KB	B190		Review Joshi email re subpoena of documents and witnesses and email correspondence with Joshi and Burrus re same.	.10	975.00	97.50
	KB	B190		Email correspondence with M Burrus re two-step research.	.10	975.00	97.50
	KB	B190		Confer with M Burrus re discovery.	.60	975.00	585.00
	KB	B190		Review and revise memo on two-step transaction and email correspondence with M Burrus re same.	2.00	975.00	1,950.00
	KB	B190		Conference call with Joshi and Burrus re subpoena.	.40	975.00	390.00
	KB	B190		Confer with M Burrus re Texas Two-Step statute and interpretation.	.70	975.00	682.50
	KB	B190		Review Cypress notice of appearance and email correspondence with Glasser re same.	.10	975.00	97.50

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Date	Init	Task	Activ	Description of Service	Hours	Rate	Amount
	CLJ	B190		Prepare document requests for third-party subpoenas; Conference with M. Burrus and K. Barrett, re: requests to Jones Day; confer with local counsel, re: form subpoena.	5.80	750.00	4,350.00
	BJM	B190		Conferred with Katherine Charonko Re: Discovery and Legal Research.	.20	550.00	110.00
	BJM	B190		Reviewed Emails Between Katherine Charonko and Mark Rasmussen Re: Revisions to Proposed Discovery Plan.	.10	550.00	55.00
	TBB	B190		Review of caselaw on dismissal of cases for lack of good faith filing for purposes of discovery issues/scope and trial.	1.30	975.00	1,267.50
	TBB	B190		Review of Texas caselaw and secondary authorities on challenges to mergers along with call with T. Basdekis regarding scope of research on issue.	.90	975.00	877.50
	TBB	B190		Review of revised draft of protective order for use in bankruptcy case and revising draft order.	.50	975.00	487.50
	MBB	B190		Motion to dismiss: Research re: Texas Divisional Merger Statute.	5.50	550.00	3,025.00
	MBB	B190		Motion to dismiss: Review proposed discovery requests to LTL.	.30	550.00	165.00
	MBB	B190		Motion to dismiss: Confer with C. Joshi and K. Barrett re: discovery requests/subpoenas.	.40	550.00	220.00
	MBB	B190		Review JD redlines re: ESI protocol.	.30	550.00	165.00
	MBB	B190		Review proposed protective order and BR proposed changes.	.30	550.00	165.00
	JEK	B190		Draft subpoena for deposition to Purple Strategies and e-mail to C. Joshi.	.30	325.00	97.50
	JEK	B190		Draft subpoena for production of documents from PriceWaterhouseCooper, and e-mail to C. Joshi	.30	325.00	97.50
	RRB	B190		Review and revise subpoena requests to PWC and email exchanges re same	.80	850.00	680.00
	RRB	B190		Additional email exchanges on documents requests to third parties	.30	850.00	255.00
	RRB	B190		Review of suits against J&J to assist in planning case and discovery strategy	.70	850.00	595.00
	JGT	B190		Begin reviewing material forwarded by Glasser relating to other cases and brief t/c with Bell regarding same.	.80	850.00	680.00
	DTM	B190		Review and revisions to Motion to Dismiss	.80	750.00	600.00
12/03/21	BAG	B190		Meeting with core counsel group on whom to chose as experts and Financial Advisor.	1.10	975.00	1,072.50

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Date	Init	Task	Activ	Description of Service	Hours	Rate	Amount
	BAG	B190		Call with Core discovery team on our response to Jones Day's initial position on written discovery.	.60	975.00	585.00
	BAG	B190		Meet and confer with Jones Day and then follow up call on our side with core discovery team to discuss our reactions on specific issues.	1.50	975.00	1,462.50
	BAG	B190		Continued preparation for deposition of Goodridge.	2.30	975.00	2,242.50
	KEC	B190		Analysis and review of ongoing discovery negotiations of served discovery.	.70	750.00	525.00
	KEC	B190		Analysis of MDL Confidentiality Order and comments to B. Glasser.	.40	750.00	300.00
	KEC	B190		Call with B. McAllister and T. Clackler regarding setting of Motion to Dismiss discovery.	.60	750.00	450.00
	KEC	B190		Analysis of response from Debtor counsel on discovery requests in preparation for meet & confer.	.50	750.00	375.00
	KEC	B190		Call with Committee Counsel regarding strategy for meet & confer with Debtor counsel.	.50	750.00	375.00
	KEC	B190		Meet and confer with Debtor's counsel regarding discovery.	1.30	750.00	975.00
	KEC	B190		Call with Committee Counsel regarding strategy from meet & confer with Debtor's counsel on discovery.	.50	750.00	375.00
	KEC	B190		Communication with Committee members regarding case updates and status of projects.	.40	750.00	300.00
	DLS	B190		Continued Preparation for Motion to Dismiss Hearing and Depositions: Begin Review of Exhibits to Debtor's Initial Pleadings and Insurance Documents; Prepare Deposition Outline based on Insurance Documents.	3.50	750.00	2,625.00
	TLC	B190		Conference call with KEC concerning discovery issues.	.70	550.00	385.00
	KB	B190		Confer with Burrus re Texas Two-Step in context of motion to dismiss.	.40	975.00	390.00
	KB	B190		Review common interest agreement and email correspondence with D Clarke re same.	.30	975.00	292.50
	CLJ	B190		Conference with discovery team.	1.20	750.00	900.00
	CLJ	B190		Attend meet and confer with opposing counsel.	1.00	750.00	750.00
	CLJ	B190		Prepare third party subpoenas.	1.20	750.00	900.00
	CLJ	B190		Draft discovery requests.	2.30	750.00	1,725.00
	BJM	B190		Conferred with Katherine Charonko and Tony Clackler Re: Discovery Issues.	.80	550.00	440.00
	BJM	B190		Reviewed Talc Claimant Committee's Motion to Dismiss Debtor's Chapter 11 Case in Preparation for Discovery.	.70	550.00	385.00
	BJM	B190		Reviewed Revisions to Proposed Discovery Plan.	.50	550.00	275.00

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Date	Init	Task	Activ	Description of Service	Hours	Rate	Amount
	BJM	B190		Reviewed Coding Panel Memorandum in Preparation for Conference Call with Tony Clackler and Katherine Charonko to Discuss Discovery Issues.	.20	550.00	110.00
	TBB	B190		Call with C. Joshi regarding additional discovery requests of Middlesex Assurance and review of draft discovery.	.50	975.00	487.50
	TBB	B190		Call regarding selection of advisors and evidentiary issues regarding use of advisors in connection with motion to dismiss.	1.10	975.00	1,072.50
	TBB	B190		Responding to email regarding evidentiary matters for trial.	.30	975.00	292.50
	MBB	B190		Motion to dismiss: Research to facilitate bad faith filing arguments.	3.10	550.00	1,705.00
	MBB	B190		Confer with K. Barrett re: bad faith filing arguments.	.70	550.00	385.00
	JEK	B190		Retrieval of witness list and e-mail to B. Glasser	.10	325.00	32.50
	RRB	B190		Review of pleadings from Imery case, Missouri case and NJ case against J&J RE statements and admissions.	2.60	850.00	2,210.00
	JGT	B190		In preparation for strategy session tomorrow review our Motion to Dismiss and the packet of pleadings relating to the various attempts by Talc claimants to obtain injunctive relief against J & J relating to the Texas two step.	2.50	850.00	2,125.00
12/04/21	BAG	B190		Working through each identified custodian to determine relevance and our current desire to depose.	2.30	975.00	2,242.50
	BAG	B190		Outlining a proposed division of work among Brown Rudnick and Bailey Glasser on the whiteboard.	.50	975.00	487.50
	BAG	B190		Work with Turner on identifying granular tasks needed in the near future for the motion to dismiss for the master task list.	3.50	975.00	3,412.50
	KEC	B190		Strategy communication with team regarding Motion to Dismiss discovery work.	.40	750.00	300.00
	KEC	B190		Communication with Debtor's counsel regarding hit reports.	.10	750.00	75.00
	DLS	B190		Reviewing LTL documents to help prepare TCC Affirmative Case, including custodian related documents.	6.60	750.00	4,950.00
	CLJ	B190		Prepare discovery summary.	1.80	750.00	1,350.00
	CLJ	B190		Prepare third-party subpoenas.	.90	750.00	675.00
	CLJ	B190		Follow up on service of third-party subpoenas.	1.10	750.00	825.00
	CLJ	B190		Draft deposition subpoenas.	1.10	750.00	825.00
	CLJ	B190		Review next steps in document and depositions strategies	1.10	750.00	825.00



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Date	Init	Task	Actv	Description of Service	Hours	Rate	Amount
	RRB	B190		Review and organize documents to assist in preparation of fact chronology	6.20	850.00	5,270.00
	JGT	B190		Work with Glasser on identifying and creating task list for the upcoming MTD hearing.	3.50	850.00	2,975.00
	JGT	B190		Continue to review and analyze background facts relating to the issues that will be pertinent to the resolution of the MTD in an effort to make sure that all relevant tasks for upcoming hearing have been identified.	3.20	850.00	2,720.00
	DTM	B190		Reviewing LTL documents to help prepare TCC MTD depositions	6.60	750.00	4,950.00
12/05/21	BAG	B190		Work on order of proof.	.40	975.00	390.00
	BAG	B190		Work on outline for Goodridge deposition.	4.20	975.00	4,095.00
	BAG	B190		Interview potential witnesses for MTD hearing.	1.10	975.00	1,072.50
	DLS	B190		Continued Reviewing LTL documents to help prepare TCC Affirmative Case, including custodian related documents.	6.80	750.00	5,100.00
	RRB	B190		Review of formation documents and documents re divisive merger and for fact chronology and began drafting fact chronology	5.80	850.00	4,930.00
	JGT	B190		Continue to identify and outline tasks for the task list in connection with the February MTD hearing.	2.20	850.00	1,870.00
	JGT	B190		Begin reviewing the 2020 Annual Report and 10Q.	1.30	850.00	1,105.00
	JGT	B190		Review and analysis of issues relating to insurance coverage for the talc claims.	1.20	850.00	1,020.00
	JGT	B190		Continue identifying and reviewing material in the Imerys bankruptcy to prepare for upcoming depositions.	1.40	850.00	1,190.00
	DTM	B190		T/C with potential witnesses for MTD BK	1.10	750.00	825.00
	DTM	B190		Review of documents and preparation for upcoming depositions for corporate representatives	4.50	750.00	3,375.00
12/06/21	BAG	B190		Meet and confer on discovery with Jones Day.	.70	975.00	682.50
	BAG	B190		Edit letter to the court and circulate same for comment as well as a call to Dan Stoltz.	.30	975.00	292.50
	BAG	B190		Continued work outlining examination for Goodridge.	2.70	975.00	2,632.50
	BAG	B190		Call with Joshi outlining deliverable before tomorrow's hearing.	.20	975.00	195.00
	KEC	B190		Meet and confer with Debtors' counsel on ESI protocol and discovery plan.	.50	750.00	375.00
	KEC	B190		Meet and confer with Debtor's counsel regarding Motion to Dismiss discovery negotiations.	.90	750.00	675.00

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	KEC	B190		Call with Brian Glasser and Jeff Jonas regarding Motion to Dismiss discovery and ESI Protocol.	.40	750.00	300.00
	KEC	B190		Analysis of documents for continued work on discovery planning and strategy.	1.60	750.00	1,200.00
	KEC	B190		Call with Brian McAllister regarding strategy on privilege logs.	.10	750.00	75.00
	KEC	B190		Email communications with Committee Representatives regarding status and updates on filings.	.50	750.00	375.00
	DLS	B190		In Firm Communications Re PI Witness and Report.	.20	750.00	150.00
	DLS	B190		Review Internal Work Product - Witness List and Outlines.	.20	750.00	150.00
	DLS	B190		Information and Communication with John Turner and Brian Glasser Re Charles Mullin Report.	.10	750.00	75.00
	KB	B190		Research re bad faith dismissal, including review of divisive merger statute and Third Circuit standards for dismissal.	2.50	975.00	2,437.50
	KB	B190		Confer with M Burrus re research on Texas Two-Step in preparation for litigation of motion to dismiss.	.30	975.00	292.50
	CLJ	B190		Follow up on service of subpoenas.	1.20	750.00	900.00
	CLJ	B190		Prepare correspondence to the court, re: depositions.	1.20	750.00	900.00
	CLJ	B190		Conference with co-counsel, re: discovery strategy.	3.30	750.00	2,475.00
	CLJ	B190		Attend meet and confer.	1.30	750.00	975.00
	CLJ	B190		Update key documents for discovery.	1.40	750.00	1,050.00
	BJM	B190		Conferred with Katherine Charonko Re: Privilege Analysis.	.10	550.00	55.00
	BJM	B190		Reviewed Emails from Katherine Charonko, Brian Glasser, and Co-Counsel Re: Orders of Proof and Attached Orders of Proof Document.	.20	550.00	110.00
	TBB	B190		Analyzing financial data for JJCI with respect to intercompany transactions and treatment on tax filings- 1.1 hr.	1.10	975.00	1,072.50
	MBB	B190		Motion to dismiss: confer with K. Barrett re: TX divisional merger statute.	1.00	550.00	550.00
	MBB	B190		Motion to dismiss: Continue research re: divisional merger issues to facilitate preparation for motion to dismiss hearing.	3.00	550.00	1,650.00
	JEK	B190		Update witness file for J. Kim	.20	325.00	65.00
	JEK	B190		E-mails to and from C. Joshi regarding witness files.	.10	325.00	32.50
	JEK	B190		Draft subpoena for deposition and production of documents to G.F. Bunting and e-mail to C. Joshi.	.20	325.00	65.00

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Date	Init	Task	Actv	Description of Service	Hours	Rate	Amount
	JEK	B190		E-mails to and from K. Charonko regarding set up of Sharefile for litigation documents.	.10	325.00	32.50
	JEK	B190		Set up sharefile for litigation documents and provide access to attorneys.	.20	325.00	65.00
	RRB	B190		Review and analysis of merger documents in connection with fact chronology; cont'd to draft fact chronology	6.80	850.00	5,780.00
	RRB	B190		Worked on issues relating to identifying custodians and directors of various J&J entities in connection with discovery	.60	850.00	510.00
	JGT	B190		Review and selection of relevant material from the Imerys bankruptcy.	1.80	850.00	1,530.00
	JGT	B190		Finalize task list and circulate to team.	1.50	850.00	1,275.00
	JGT	B190		Receive feedback from team regarding task list and finalize same.	.50	850.00	425.00
	JGT	B190		Assist Cary with in determining board membership of relevant entities.	.30	850.00	255.00
	JGT	B190		Receive additional feedback from team regarding task lists and make revisions to same.	.40	850.00	340.00
	JGT	B190		Review and analysis of the LTL bankruptcy docket and identify and review material in order to develop better understanding of the background facts.	2.50	850.00	2,125.00
12/07/21	BAG	B190		Prepare for hearing with court over deposition of Goodridge as well as other issues that might arise, including receiving and responding to letters.	1.50	975.00	1,462.50
	BAG	B190		Further drafting of Goodridge outline.	1.50	975.00	1,462.50
	BAG	B190		Review, approve and circulate revised task list to Brown Rudnick for their concurrence.	.30	975.00	292.50
	BAG	B190		Attend hearing on discovery.	.80	975.00	780.00
	BAG	B190		Post hearing call with Stoltz and Jonas on next moves.	.20	975.00	195.00
	BAG	B190		Outlining my remarks to the committee for tomorrow's meeting on the motion to dismiss.	.40	975.00	390.00
	KEC	B190		Communication with committee members regarding filings and strategy.	.60	750.00	450.00
	KEC	B190		Analysis and revisions of motion to dismiss discovery outlines and communication with litigation team regarding the same.	.70	750.00	525.00
	DLS	B190		Review Letter to Court Re Goodridge.	.10	750.00	75.00
	KB	B190		Confer with J Turner re litigation strategy on motion to dismiss.	.50	975.00	487.50
	KB	B190		Confer with T Bennett re two-step research.	.20	975.00	195.00
	CLJ	B190		Prepare deposition subpoenas.	1.10	750.00	825.00

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	CLJ	B190		Update witness list.	.40	750.00	300.00
	CLJ	B190		Coordinate document subpoenas.	.90	750.00	675.00
	TBB	B190		Review and analysis of debtor's counsel's response and objection to discovery in preparation for call on discovery with Court.	.20	975.00	195.00
	MBB	B190		Motion to dismiss: Research re: divisional merger.	1.40	550.00	770.00
	MBB	B190		Review Debtor proposed redlines to protective order.	.10	550.00	55.00
	JEK	B190		E-mails to and from J. Turner regarding whiteboard images.	.20	325.00	65.00
	RRB	B190		Review of task list and assignments and review of custodian list in connection with possible witnesses	.30	850.00	255.00
	RRB	B190		Review of closing documents, and pleadings and exhibits from LTL bankruptcy docket for facts pertinent to case and for entry on fact chronology; cont'd to review and revise fact chronology	6.80	850.00	5,780.00
	JGT	B190		Assist Glasser with preparation for upcoming discovery hearing.	1.70	850.00	1,445.00
	JGT	B190		Conduct review of Motions (and exhibits) relating to the Motion to transfer venue.	1.30	850.00	1,105.00
	JGT	B190		Assist with Goodridge deposition preparation.	.50	850.00	425.00
	JGT	B190		Review and analysis of the October 11 Approval Memorandum.	.40	850.00	340.00
	JGT	B190		Identify and review articles regarding J & J talc claims and J & J's various approaches to dealing with same.	1.60	850.00	1,360.00
	JGT	B190		Review and analysis of docket and pleadings relating to the Trane Technologies and CertainTeed bankruptcies.	1.30	850.00	1,105.00
12/08/21	BAG	B190		Thinking thorough discovery dispute with Debtor.	.20	975.00	195.00
	BAG	B190		Call with committee member representative to answer questions.	.40	975.00	390.00
	BAG	B190		Giving assignment to Selby on our affirmative case.	.10	975.00	97.50
	BAG	B190		Giving assignment to Turner.	.10	975.00	97.50
	BAG	B190		Call with Barrett about an aspect of proof for the motion to dismiss.	.20	975.00	195.00
	BAG	B190		Conference with co-counsel to prepare for committee meeting, assigning roles and determining counsel position on several issues.	.90	975.00	877.50
	BAG	B190		Working through my notes as well as documents to determine the first seven custodians we wish to designate.	1.20	975.00	1,170.00

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Date	Init	Task	Activ	Description of Service	Hours	Rate	Amount
	BAG	B190		Lengthy call with the committee to brief them on motion to dismiss strategy and experts, among other things.	1.70	975.00	1,657.50
	BAG	B190		Call with Committee Representative on one piece of proof in the motion to dismiss.	.10	975.00	97.50
	BAG	B190		Email traffic searching for a relevant witness.	.10	975.00	97.50
	BAG	B190		Reading documents flagged for me by a committee representative.	1.90	975.00	1,852.50
	KEC	B190		Strategy communication regarding ongoing discovery and work regarding custodians.	.40	750.00	300.00
	KEC	B190		Continued work and revisions to ESI protocol discovery analysis.	.90	750.00	675.00
	KEC	B190		Communication and work regarding document analysis of materials related to upcoming depositions and motion to dismiss discovery.	.90	750.00	675.00
	DLS	B190		Internal Communications with Brian Glasser Re BCBS Information. External Communications with BCBS TCC Member.	.20	750.00	150.00
	TLC	B190		Drafting and editing of coding memo.	.80	550.00	440.00
	KB	B190		Confer with Glasser re litigation strategy on motion to dismiss.	.30	975.00	292.50
	KB	B190		Email correspondence with BG team re abridging rights in divisive merger in preparation for dismissal hearing.	.20	975.00	195.00
	CLJ	B190		Follow up on third-party discovery.	.50	750.00	375.00
	TBB	B190		Analyzing debtor's schedules regarding valuations for purposes of motion to dismiss and memo regarding same.	1.10	975.00	1,072.50
	TBB	B190		Zoom meeting of counsel for committee regarding strategy and related issues along with meeting with clients' representatives.	.90	975.00	877.50
	TBB	B190		Zoom meeting with client's representatives/counsel regarding various issues involving motion to dismiss, preliminary injunction, and other contested matters.	1.70	975.00	1,657.50
	MBB	B190		Confer with committee co-counsel re: litigation strategy and upcoming hearings.	.90	550.00	495.00
	MBB	B190		Confer with committee members re re: litigation strategy, upcoming hearings, and retention of professionals.	1.70	550.00	935.00
	MBB	B190		Motion to dismiss: Confer with K. Barrett re: TX divisional merger statute.	.10	550.00	55.00
	MBB	B190		Motion to dismiss: continue research re: divisional merger.	2.50	550.00	1,375.00

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Date	Init	Task	Activ	Description of Service	Hours	Rate	Amount
	RRB	B190		Review of informational briefs filed by debtor and by Talc claimants for various factual statements made pertaining to case as part of continued drafting and editing of fact chronology.	7.40	850.00	6,290.00
	JGT	B190		Review of the J & J privilege log in the talc litigation and search for references to potential deponents	.50	850.00	425.00
	JGT	B190		Continued legal research regarding the "new debtor syndrome" in Bankruptcy Courts and Courts of Appeals.	1.50	850.00	1,275.00
	JGT	B190		Finish reviewing pleadings and background documents relating to the LTL bankruptcy.	1.70	850.00	1,445.00
	JGT	B190		Assist with preparation for the deposition of Goodridge.	2.20	850.00	1,870.00
	JGT	B190		Review press accounts and stock analysts' consideration of the J&J spin off of the Consumer Unit.	.80	850.00	680.00
	JGT	B190		Review the Imerys Proposed Plan to ascertain the amount and nature of the proposed Trust assets and the value of those assets.	.70	850.00	595.00
12/09/21	BAG	B190		Meeting with Jeff Jonas and Danielle D'Aquila and my team on the custodians we want to name and assigning tasks.	.60	975.00	585.00
	BAG	B190		Drafting then exchanging emails with Jones Day on discovery issues.	.40	975.00	390.00
	BAG	B190		Call with co-counsel to outline the response on the preliminary injunction and to agree on our position on meet and confer issues with Jones Day for later tonight.	.90	975.00	877.50
	BAG	B190		Drafting, circulating and then sending email to Jones Day accepting deposition dates for certain witnesses.	.20	975.00	195.00
	BAG	B190		Meet and confer with Jones Day.	.30	975.00	292.50
	BAG	B190		Read Arnold & Itkin's Motion to Dismiss.	1.10	975.00	1,072.50
	BAG	B190		Working through the discovery disputes as they stand to draft a comprehensive summary email to Jones Day.	1.60	975.00	1,560.00
	KEC	B190		Strategy call with T. Clackler regarding revisions to document regarding training memorandum.	.40	750.00	300.00
	KEC	B190		Communication with Jones Day on discovery issues and ESI protocol.	.50	750.00	375.00
	KEC	B190		Email communication with committee regarding strategy and filings.	.60	750.00	450.00
	KEC	B190		Litigation team strategy call on discovery issues.	.50	750.00	375.00
	KEC	B190		Analysis and drafting work related to document analysis for ongoing development of Motion to Dismiss advancement.	1.30	750.00	975.00
	KEC	B190		Drafting and revisions of Motion to Dismiss document review training memorandum and materials.	1.90	750.00	1,425.00

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Date	Init	Task	Actv	Description of Service	Hours	Rate	Amount
	DLS	B190		Conference Call with Liz Carter and Pam Slate re: Motion to Dismiss.	.60	750.00	450.00
	DLS	B190		Internal Communications Re Depositions of Goodridge, Azedvedo, and Wuesthoff.	.50	750.00	375.00
	DLS	B190		Communications with John Turner and Todd Mathews re Info in Imerys Amended Plan.	.10	750.00	75.00
	TLC	B190		Reviewed, analyzed, and coded documents for AI.	2.00	550.00	1,100.00
	CLJ	B190		Update key documents for hearing.	.40	750.00	300.00
	CLJ	B190		Update subpoenas.	.90	750.00	675.00
	TBB	B190		Meeting of counsel regarding response to debtor's request for extension of preliminary injunction including discovery issues.	.90	975.00	877.50
	MBB	B190		Review Arnold & Itkin notice of and motion to dismiss case.	.40	550.00	220.00
	JEK	B190		E-mails to and from C. Joshi regarding subpoena to Scott Erikson at Travelers	.30	325.00	97.50
	JEK	B190		Draft subpoena to Scott Erikson at Travelers and e-mail to C. Joshi	.40	325.00	130.00
	RRB	B190		Review and analysis of various documents re: declarations filed in LTL bankruptcy proceeding, exhibits to declarations, exhibits to various motions filed in case, including motion to transfer, and review of hearing transcripts from first day hearing and injunction hearing as part of drafting and editing fact chronology to support claims.	5.40	850.00	4,590.00
	JGT	B190		Review insurance company correspondence.	.80	850.00	680.00
	JGT	B190		Review and analysis of Funding Agreement to develop areas of inquiries for upcoming depositions.	.80	850.00	680.00
	JGT	B190		Continued preparation for the deposition of Goodridge.	1.50	850.00	1,275.00
	JGT	B190		Brief review of the scope of documents previously produced by J&J in the LTL bankruptcy proceeding	.50	850.00	425.00
	JGT	B190		Begin efforts to obtain and review the docket for New Jersey declaratory action proceeding.	.20	850.00	170.00
	JGT	B190		Review the MTD filed by Arnold and Itkin.	.50	850.00	425.00
	JGT	B190		Prepare examination outline for Goodridge deposition to cover additional selected topics (includes time spent selecting additional exhibits for possible use at the deposition).	2.50	850.00	2,125.00
	JGT	B190		Brief review of the exhibits to the Mullin deposition.	.30	850.00	255.00
	JSC	B190		Research re and draft case summaries for chart of cases denying motions to dismiss chapter 11 petitions on bad faith grounds.	1.70	550.00	935.00

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12/10/21	BAG	B190		Review and think through email and attachments form Jones Day.	.20	975.00	195.00
	BAG	B190		Call with Stoltz and Jonas to determine our position on a discovery issue.	.10	975.00	97.50
	BAG	B190		Telephone call with committee representative on strategy.	.40	975.00	390.00
	BAG	B190		Preparation call among counsel for call with committee members.	.30	975.00	292.50
	BAG	B190		Draft meet and confer summary email to Jones Day.	2.30	975.00	2,242.50
	BAG	B190		Call with committee members themselves to orient them to the case strategy and answer questions.	1.10	975.00	1,072.50
	BAG	B190		Email traffic with Jones Day on the depositions.	.10	975.00	97.50
	KEC	B190		Communication with Debtor's counsel regarding ongoing meet and confer on discovery issues.	.60	750.00	450.00
	KEC	B190		Analysis of revised hit report from Debtor's counsel regarding discovery requests.	.30	750.00	225.00
	KEC	B190		Communications with litigation team regarding discovery negotiations and meet and confer with Debtor's counsel.	.30	750.00	225.00
	DLS	B190		Emails from and to Don Clarke and others Re upcoming depositions and subpoenas. Internal Communications Re Same.	.30	750.00	225.00
	TLC	B190		Reviewed, analyzed, and coded docs for AI training.	5.80	550.00	3,190.00
	CLJ	B190		Prepare summary of all discovery disputes to date for all parties.	2.10	750.00	1,575.00
	CLJ	B190		Follow up on third-party subpoenas and depositions.	1.00	750.00	750.00
	TBB	B190		Review of documents and emails regarding selection of financial advisors for Motion to Dismiss along with scheduling of interviews of same.	.30	975.00	292.50
	JEK	B190		E-mails to and from J. Turner regarding exhibits for Goodright.	.10	325.00	32.50
	MRR	B190		Per review and analysis of documents in binders, create index listing tab number, bates ranges, document description, and document date.	2.10	325.00	682.50
	RRB	B190		Review and analysis of arguments and authorities in Arnold & Itkin's MTD	.70	850.00	595.00
	JGT	B190		Participate in telephone conference with Glasser and other attorneys re: Motion to Dismiss.	.30	850.00	255.00
	JGT	B190		Continue process of gathering information in the New Jersey State Court insurance action.	.40	850.00	340.00



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	JGT	B190		Finish outlining additional topics for the Goodridge deposition and provide same to Glasser.	2.70	850.00	2,295.00
	JGT	B190		Review services agreements in the closing binders in connection with the meet and confer letter.	.30	850.00	255.00
	JGT	B190		Review exhibits (4 binders) from the PI hearing.	1.50	850.00	1,275.00
	JSC	B190		Research re and draft case summaries for chart of cases denying motions to dismiss petitions on bad faith grounds.	.80	550.00	440.00
12/11/21	BAG	B190		Review, draft and circulate email traffic with Jones Day on pending discovery requests.	.80	975.00	780.00
	BAG	B190		Email traffic with Don Clarke on serving relevant folks with notices of deposition.	.10	975.00	97.50
	BAG	B190		Continued work on Goodright examination.	.80	975.00	780.00
	BAG	B190		Review edit and circulate proposed letter to court on discovery dispute.	.30	975.00	292.50
	BAG	B190		Read and respond to email from Stoltz on letter.	.10	975.00	97.50
	DLS	B190		Preparation and Work Related to MTD and Goodridge Deposition.	2.50	750.00	1,875.00
	CLJ	B190		Draft letter to court, re: redacted board meeting minutes.	.60	750.00	450.00
	CLJ	B190		Research, re: privilege.	.60	750.00	450.00
	TBB	B190		Review of supplemental documents from potential financial advisors and transcripts of testimony of potential financial advisors in advance of interviews.	.90	975.00	877.50
12/12/21	BAG	B190		Revise letter and circulate to core team.	.10	975.00	97.50
	BAG	B190		Comment to Stark on a request he made.	.10	975.00	97.50
	BAG	B190		Finish and circulate first draft of Goodridge examination.	1.20	975.00	1,170.00
	BAG	B190		Further edits to Goodridge exam.	.40	975.00	390.00
	DLS	B190		Preparation and Work Related to MTD.	1.20	750.00	900.00
	TBB	B190		Review of questions for deposition of Goodridge along with drafting of revisions to questions and review of revised draft.	2.60	975.00	2,535.00
12/13/21	BAG	B190		Email with MTD core counsel for strategy call.	.10	975.00	97.50
	BAG	B190		Email with Jones Day about agreed exhibit.	.10	975.00	97.50
	BAG	B190		Meet with staff on index to documents.	.10	975.00	97.50
	BAG	B190		Call with core mtd team on discovery disputes and relevant custodians with follow up email to Jones Day.	.50	975.00	487.50
	BAG	B190		Reviewing task list assignments with core MTD team.	.50	975.00	487.50

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	BAG	B190		Interviewing experts and FAs and choosing, with Committee.	4.40	975.00	4,290.00
	BAG	B190		Reading through Jones Day's latest discovery missive and making notes related to same.	1.70	975.00	1,657.50
	BAG	B190		Meet and confer with Jones Day on hearing on the 15th.	.90	975.00	877.50
	KEC	B190		Strategy call with Motion to Dismiss team regarding ongoing litigation tasks.	.60	750.00	450.00
	KEC	B190		Strategy emails with litigation team regarding Motion to Dismiss tasks and discovery.	.70	750.00	525.00
	KEC	B190		Analysis of letters and emails from Jones Day regarding Motion to Dismiss discovery negotiations.	1.90	750.00	1,425.00
	KEC	B190		Continued analysis and work with documents as they relate to Motion to Dismiss discovery.	1.90	750.00	1,425.00
	CLJ	B190		Review recent correspondence, re: discovery.	.30	750.00	225.00
	CLJ	B190		Conference with internal team, re: response to discovery disputes and to do items.	.50	750.00	375.00
	CLJ	B190		Conference with internal team, task list for trial preparation.	1.00	750.00	750.00
	CLJ	B190		Draft letter to court, re: discovery dispute on redacted board meeting notes; gather feedback then finalize and send letter.	1.50	750.00	1,125.00
	CLJ	B190		Research, re: third party deposition subpoena process.	.60	750.00	450.00
	CLJ	B190		Conference with D. Clarke, re: status of subpoenas.	.50	750.00	375.00
	CLJ	B190		Assign out trial preparation tasks and communicate tasks.	.90	750.00	675.00
	CLJ	B190		Review recent filings related to Motion to Dismiss.	.50	750.00	375.00
	BJM	B190		Reviewed Legal Research Memorandum Re: Privilege.	.30	550.00	165.00
	TBB	B190		Further review of supplemental materials supplied by potential financial advisors for motion to dismiss and preliminary injunction matters for interviews.	.40	975.00	390.00
	TBB	B190		Zoom meetings with clients and co-counsel regarding financial advisors and interviews.	.80	975.00	780.00
	MBB	B190		Motion to dismiss: Review Goodridge deposition outline.	.90	550.00	495.00
	JEK	B190		Revise subpoenas for depositions and production of documents and e-mail to C. Joshi.	.80	325.00	260.00
	JEK	B190		Update case calendar with new deadlines and hearing dates.	.30	325.00	97.50
	JEK	B190		E-mails to and from R. Bell regarding transcripts from hearings.	.20	325.00	65.00

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Talc Creditors Committee  
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Date	Init	Task	Actv	Description of Service	Hours	Rate	Amount
	MRR	B190		Per review of final binder and electronic documents, analyze, and update index listing various information regarding documents, and disseminate index to attorneys for review.	1.80	325.00	585.00
	RRB	B190		Review and analysis of documents and background information on J&J and talc litigation, including information from talc cases for inclusion in fact chronology	3.00	850.00	2,550.00
	JGT	B190		Review status of pending matters re: Motion to Dismiss.	.30	850.00	255.00
	JGT	B190		Review pleadings related to the insurance declaratory judgment action.	1.10	850.00	935.00
	JGT	B190		Review LTL bankruptcy docket and selection and review of substantive pleadings filed.	1.30	850.00	1,105.00
	JGT	B190		Review most recent witness and task list.	.20	850.00	170.00
	DTM	B190		Numerous emails and phone calls with vendor, opposing counsel and co-counsel coordinating for the depositions on Dec 20 and 22.	1.80	750.00	1,350.00
12/14/21	BAG	B190		Gathering base documentation and outlining and preparing powerpoint for omnibus hearing, including numerous edits and calls on same with co-counsel.	3.80	975.00	3,705.00
	KEC	B190		Strategy call with J. Turner and R. Bell regarding Motion to Dismiss discovery.	.40	750.00	300.00
	KEC	B190		Conference with Arnold Blair regarding discovery platform training and strategy.	1.00	750.00	750.00
	KEC	B190		Working on analysis of meeting minutes in anticipation of hearings on Wednesday.	.60	750.00	450.00
	KEC	B190		Communication with bankruptcy team regarding ongoing discovery projects .	.40	750.00	300.00
	KEC	B190		Communication with T. Clackler regarding discovery issue on searchable sources of discovery in Third Circuit.	.80	750.00	600.00
	KEC	B190		Communication with team regarding execution of MDL protective order and executing protective order.	.30	750.00	225.00
	KEC	B190		Communications with Motion to Dismiss team regarding responses to discovery letters from Jones Day.	.50	750.00	375.00
	DLS	B190		Review JPML Order - Bankruptcy does not bar transfer of talc claims into MDL Docket.	.20	750.00	150.00
	DLS	B190		Assist with Prepare for Goodridge Deposition.	.50	750.00	375.00
	TLC	B190		Research on discovery and custodian issues. Sent findings to KEC.	1.20	550.00	660.00

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Date	Init	Task	Actv	Description of Service	Hours	Rate	Amount
	KB	B190		Review flow chart of divisional merger and consider issues relating to the same under UFTA and merger statute.	.20	975.00	195.00
	KB	B190		Confer with J Turner re discovery and dismissal issues.	.20	975.00	195.00
	KB	B190		Review deposition outline for Goodright, including review of dismissal motions to determine necessary facts.	.90	975.00	877.50
	CLJ	B190		Review correspondence, re: choice of 7 custodians for documents searches.	.80	750.00	600.00
	CLJ	B190		Review memo and do additional research, re: attorney client privilege.	.90	750.00	675.00
	CLJ	B190		Review documents from Adversary Proceeding in preparation for depositions.	1.80	750.00	1,350.00
	CLJ	B190		Correspond with local counsel, re: subpoena to Travelers.	.20	750.00	150.00
	CLJ	B190		Draft email, re: redacted offer letter of J. Kim.	.30	750.00	225.00
	BJM	B190		Reviewed Confidentiality Order.	.20	550.00	110.00
	BJM	B190		Exchanged Emails with Katherine Charonko and Whitney Johnson Re: Acknowledgment of Confidentiality Order.	.10	550.00	55.00
	MBB	B190		Motion to dismiss: Review letter to court re: Debtor's redaction of board minutes.	.10	550.00	55.00
	MBB	B190		Motion to dismiss: review Debtor's response to Committee letter to court re: redacted board minutes.	.10	550.00	55.00
	RRB	B190		Review and execute confidentiality order	.20	850.00	170.00
	RRB	B190		T/c with Kate Charanko and John Turner re document review project for various custodians	.70	850.00	595.00
	RRB	B190		Review of pretrial issues including status of discussions of various items set for Omnibus hearing and issues re MDL transfer order	.40	850.00	340.00
	RRB	B190		Review of memo on document review plan	.20	850.00	170.00
	RRB	B190		Review and respond to email from Brown Rudnick re fact chronology	.20	850.00	170.00
	RRB	B190		Review and select documents from custodian folders off disco database for deposition and trial exhibits	2.30	850.00	1,955.00
	RRB	B190		Review documents from talc litigation cases and from Imerys bankruptcy for additions to fact chronology; review and revise fact chronology	2.10	850.00	1,785.00
	JGT	B190		Review status of pending matters (includes exchange of e-mails and telephone conferences with team members) re: Motion to Dismiss.	.50	850.00	425.00

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Date	Init	Task	Actv	Description of Service	Hours	Rate	Amount
	JGT	B190		In preparation for upcoming call, review link forwarded by Kate Charonko and brief telephone conference with Bell regarding same.	.30	850.00	255.00
	JGT	B190		Attention to preparation for upcoming depositions.	.30	850.00	255.00
	JGT	B190		Telephone conference regarding the document review project relating to hits on proposed custodians.	.60	850.00	510.00
	JGT	B190		Review spreadsheet regarding case law relating to bad faith dismissal of Chapter 11 bankruptcy.	.30	850.00	255.00
	JGT	B190		Review J & J Confidentiality Order and execute Agreement.	.10	850.00	85.00
	JGT	B190		Review and analysis of document review memo forwarded by Kate.	.20	850.00	170.00
	JGT	B190		Review and liability tag my portion of the targeted review documents in the LTL Management library (includes a review of the Lisman deposition).	1.80	850.00	1,530.00
	JSC	B190		Research re and draft summary of cases denying dismissal of Chapter 11 petitions on bad faith grounds.	5.10	550.00	2,805.00
	DTM	B190		Acquisition and Coordination of information for Depositions for Dec 20 and 22	.50	750.00	375.00
12/15/21	BAG	B190		Prepare for and attend omnibus hearing to handle discovery issues and subsequent meeting with committee representatives.	6.00	975.00	5,850.00
	BAG	B190		Call with Committee representative about depositions.	.10	975.00	97.50
	BAG	B190		Reading US Trustee's motion and memoranda in support of an examiner and email traffic on same.	.30	975.00	292.50
	KEC	B190		Attend Omnibus Hearing via Zoom.	3.00	750.00	2,250.00
	KEC	B190		Analysis and revisions of various drafts of ESI Protocol and discovery plan.	1.90	750.00	1,425.00
	KEC	B190		Strategy communication regarding revisions of ESI Protocol with Motion to Dismiss team.	.70	750.00	525.00
	KEC	B190		Post hearing strategy call with Motion to Dismiss team regarding judicial rulings.	.50	750.00	375.00
	KEC	B190		Post hearing strategy call with C. Joshi regarding judicial rulings.	.50	750.00	375.00
	KEC	B190		Post hearing strategy call with B. Glasser regarding judicial rulings.	.50	750.00	375.00
	KEC	B190		Post hearing strategy call and revisions to ESI Protocol with B. McAllister.	.40	750.00	300.00
	DLS	B190		Post hearing strategy call with B. Glasser regarding insurance documents and information for upcoming depositions.	.30	750.00	225.00

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Date	Init	Task	Actv	Description of Service	Hours	Rate	Amount
	KB	B190		Confer with Glasser re discovery conference and outcomes.	.10	975.00	97.50
	CLJ	B190		Attend 341 hearing for exam by TCC attorneys.	1.30	750.00	975.00
	CLJ	B190		Conference with legal team, re: updates from hearings and follow issues to address.	.30	750.00	225.00
	BJM	B190		Conferred with Katherine Charonko Via Telephone Re: Omnibus Hearing and ESI Protocol.	.40	550.00	220.00
	BJM	B190		Reviewed and revised Draft Discovery Plan and ESI Protocol.	.30	550.00	165.00
	BJM	B190		Reviewed Jones Day's December 13, 2021 Meet-and-Confer Letter in Conjunction with Discovery.	.40	550.00	220.00
	JEK	B190		E-mails to and from C. Joshi regarding research files.	.20	325.00	65.00
	JEK	B190		Retrieval and organize research files.	1.20	325.00	390.00
	JEK	B190		Update case calendar regarding objection deadlines.	.20	325.00	65.00
	JEK	B190		E-mails to and from Court Reporter and Attorneys regarding depositions scheduled for December 20, 2021 and December 22, 2021	.50	325.00	162.50
	JGT	B190		Review insurance dec action docket and begin reviewing identified pleadings.	2.50	850.00	2,125.00
	DTM	B190		Attend Omnibus Hearing.	3.00	750.00	2,250.00
				<b>Sub-Total of Task</b>	<b>\$ 637,107.50</b>		

**B195 Non Working Travel**

Date	Init	Task	Actv	Description of Service	Hours	Rate	Amount
11/11/21	DLS	B195		Travel from Charlotte NC to Birmingham: Talc Creditors Committee Meeting and Venue Bankruptcy Hearing (9.4 hours marked down to one-half time).	4.70	750.00	3,525.00
11/14/21	BAG	B195		Travel from DC to NYC for meetings with committee and co-counsel (4.2 hours marked down to one-half).	2.10	975.00	2,047.50
	DLS	B195		Prepare for and Travel from Birmingham to NYC: Meetings with Talc Creditors Committee and Co-Counsel (8.2 hours marked down to one-half).	4.10	750.00	3,075.00
	CLJ	B195		Travel to NYC for meeting with clients (1.8 hours marked down to one-half).	.90	750.00	675.00
	MBB	B195		Travel to NYC for meetings with co-counsel and creditors' committee members re: case strategy (9.0 hours marked down to one-half).	4.50	550.00	2,475.00

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Date	Init	Task	Actv	Description of Service	Hours	Rate	Amount
	DTM	B195		Travel from STL to NYC for CC meetings on Dec 15 and 16, including 2 hr travel delay (6.4 hours marked down to one-half).	3.20	750.00	2,400.00
11/15/21	KB	B195		Travel to NYC for creditors committee meetings (2.0 hours marked down to one-half).	1.00	975.00	975.00
	TBB	B195		Travel to New York for meeting with committee members and co-counsel-(6.2 hr marked down to one-half of 3.2 hours)	1.60	975.00	1,560.00
11/16/21	BAG	B195		Travel from NYC back to DC (3.0 hours marked down one-half).	1.50	975.00	1,462.50
	KEC	B195		Travel back to West Virginia from Creditor Committee meeting (5.6 hours marked down one-half).	2.80	750.00	2,100.00
	DLS	B195		Travel from NYC to Birmingham: Meetings with Talc Creditors Committee and Co-Counsel (7.8 hours marked down one-half).	3.90	750.00	2,925.00
	CLJ	B195		Travel from New York to Washington, DC (1.4 hours marked down one-half).	.70	750.00	525.00
	MBB	B195		Travel from NYC meetings to DC (1.4 hours marked down one-half).	.70	550.00	385.00
	DTM	B195		Travel from NYC to STL from CC meetings (4.6 hours marked down one-half).	2.30	750.00	1,725.00
11/17/21	TBB	B195		Return from New York meeting to office (6.0 hours marked down one-half of 3.0 hours)	1.50	975.00	1,462.50
11/18/21	MBB	B195		Travel from DC to CRW (2.6 hours marked down one-half).	1.30	550.00	715.00
11/20/21	TBB	B195		Travel to Trenton, NJ for meeting with counsel on 11/21/21 and bankruptcy court hearings on 11/22/21 (5.6 hours marked down one-half of 2.8 hours).	1.40	975.00	1,365.00
11/21/21	BAG	B195		Travel from DC to Princeton (3.6 hours marked down one-half)	1.80	975.00	1,755.00
11/22/21	BAG	B195		Travel to hearing in Trenton (.40 hours, but only billed one-half).	.20	975.00	195.00
	BAG	B195		Begin travel home from Trenton, NJ (.80 hours marked down one-half).	.40	975.00	390.00
11/23/21	BAG	B195		Finish the drive home from yesterday's hearing in Trenton, NJ (2.8 hours marked down one-half).	1.40	975.00	1,365.00
	TBB	B195		Travel Trenton/Princeton to home office in Lexington, Va. (6.4 hours marked down one-half of 3.2 hours)	1.60	975.00	1,560.00
12/01/21	DLS	B195		Travel from Boston Office to DC for Firm Strategy Meetings, Document Review, and Deposition Preparation (2.5 hours marked down one-half).	2.50	750.00	1,875.00

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Date	Init	Task	Actv	Description of Service	Hours	Rate	Amount
12/03/21	RRB	B195		Travel from Waco to DC for to work on discovery issues and planning re MTD hearing (5.2 hours marked down one-half).	2.60	850.00	2,210.00
	JGT	B195		Travel time from Austin to Washington DC for team meeting (work done during travel but billed separately and is not included in this amount) 4.4 hours marked down one-half).	2.20	850.00	1,870.00
12/09/21	RRB	B195		Travel from DC back to Waco, TX (8.4 hours marked down one-half).	4.20	850.00	3,570.00
12/10/21	JGT	B195		Travel time (5.6 hours marked down to one-half).	2.80	850.00	2,380.00
12/14/21	BAG	B195		Travel to Princeton for hearing tomorrow (3.8 hours marked down one-half).	1.90	975.00	1,852.50
	TBB	B195		Travel to Trenton, NJ for 12/15/21 for hearings on various matters (6.0 hours marked down one-half of 3.0 hours).	1.50	975.00	1,462.50
12/15/21	BAG	B195		Drive to DC from Court (4.2 hours marked down one-half).	2.10	975.00	2,047.50
	TBB	B195		Return travel from Newark, N.J. (6.0 hours marked down one-half of 3.0 hours).	1.50	975.00	1,462.50

**Sub-Total of Task \$ 53,392.50**

**TOTAL PROFESSIONAL SERVICES \$ 867,462.50**

**EXPENSES ADVANCED**

Copying

Date	Task	Description	Amount
12/10/21	E101	Copying/Printing	580.60
<b>Sub-Total of Expenses:</b>			<b>\$ 580.60</b>

Outside Printing

Date	Task	Description	Amount
11/21/21	E102	Brian A. Glasser; Copies for Brian Glasser	7.41
<b>Sub-Total of Expenses:</b>			<b>\$ 7.41</b>



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Online Research

Date	Task	Description	Amount
12/12/21	E106	Legal Research for November 2021.	1,349.26
<b>Sub-Total of Expenses:</b>			<b>\$ 1,349.26</b>

Out-of-Town Travel

Date	Task	Description	Amount
11/13/21	E110	Airfare for Kate Charonko 11/14/2021	825.40
11/13/21	E110	Airfare for Kate Charonko 11/16/2021	318.20
11/13/21	E110	Airfare fee for Kate Charonko 11/16/2021	29.68
11/13/21	E110	Airfare for Maggie Burrus 11/14/2021	825.40
11/13/21	E110	Airfare fee for Maggie Burrus 11/14/2021	29.68
11/13/21	E110	Talc Complaint Committee. Brian Glaser Train to NYC for meetings.	321.00
11/13/21	E110	Cary Joshi; Transportation from meetings in New York to Washington, DC.	302.00
11/14/21	E110	Kate Charonko; Rental car for traveling to NY for Creditor Committee Member Meeting.	189.22
11/15/21	E110	Thomas Bennett; Mileage from Lexington, VA to NYC and back	471.52
11/15/21	E110	Talc Complaint Committee. Brian Glasser Train to NYC for meetings. Return.	154.00
11/15/21	E110	Thomas Bennett; Lodging for Tom Bennett	923.02
11/15/21	E110	Cary Joshi; Transportation to and from meetings.	23.00
11/16/21	E110	Airfare for Maggie Burrus DC to CRW 11/18/2021	421.40
11/16/21	E110	Airfare fee for Maggie Burrus 11/18/2021	29.68
11/16/21	E110	Brian A. Glasser; Lodging for Brian Glasser	855.12
11/16/21	E110	Airfare for Kate Charonko on 11/16/2021.	1,083.20
11/16/21	E110	Thomas Bennett; Cab Fee for Tom Bennett	19.30
11/16/21	E110	Thomas Bennett; Parking for Tom Bennett	80.00
11/16/21	E110	Kate Charonko; Hotel stay for Creditor Committee Meeting.	750.60
11/16/21	E110	Kate Charonko; Airport parking while traveling to NY for Creditor Committee Member Meeting.	27.00
11/17/21	E110	Airfare Fee for Kate Charonko on 11/16/2021.	29.68
11/17/21	E110	Thomas Bennett; Parking for Tom Bennett	80.00
11/20/21	E110	Thomas Bennett; Mileage fro Lexington, VA to Princeton, NJ and Trent, NJ and Back	449.12
11/21/21	E110	Brian A. Glasser; Mileage for Brian Glasser	104.90
11/21/21	E110	Brian A. Glasser; Mileage for Brian Glasser	-104.90
11/21/21	E110	Brian A. Glasser; Fuel for Brian Glasser	65.88
11/21/21	E110	Thomas Bennett; Lodging for Tom Bennett	341.62

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Date	Task	Description	Amount
11/22/21	E110	Brian A. Glasser; Mileage for Brian Glasser	26.53
11/22/21	E110	Brian A. Glasser; Mileage for Brian Glasser	-26.53
11/22/21	E110	Brian A. Glasser; Parking for Brian Glasser	12.00
11/23/21	E110	Brian A. Glasser; Mileage for Brian Glasser	82.14
11/23/21	E110	Brian A. Glasser; Mileage for Brian Glasser	-82.14
11/23/21	E110	Brian A. Glasser; Lodging for Brian Glasser	192.98
11/30/21	E110	Maggie Burrus; Uber from committee meetings to Penn Station.	26.53
11/30/21	E110	Maggie Burrus; Uber to hotel.	16.36
11/30/21	E110	Maggie Burrus; Uber to client's office for committee meetings.	26.72
11/30/21	E110	Maggie Burrus; Hotel room for committee meetings in NYC.	980.08
11/30/21	E110	Maggie Burrus; Uber from Union Station to hotel.	15.08
11/30/21	E110	Maggie Burrus; Hotel in DC for committee projects.	549.46
12/03/21	E110	Robert Bell; mileage to and from Austin Airport from Waco	101.92
12/03/21	E110	Cary Joshi; Transportation from meetings in New York to Washington, DC.	194.00
12/03/21	E110	John Turner III; Cab fare from airport for MTD hearing prep	25.00
12/03/21	E110	John Turner III; Flight to DC for MTD hearing prep	346.48
12/03/21	E110	Robert Bell; hotel in DC for discovery and trial prep meetings	1,488.60
12/03/21	E110	Robert Bell; uber fare from DCA to hotel	23.50
12/03/21	E110	Robert Bell; airfare from Austin Tx to DC and return for discovery planning and trial prep	695.95
12/05/21	E110	John Turner III; Parking at airport for MTD hearing prep trip	81.00
12/09/21	E110	Robert Bell; cab fare to DCA from hotel	24.08
12/09/21	E110	Robert Bell; airport parking	119.00
12/10/21	E110	John Turner III; Flight to DC for MTD hearing prep	341.98
12/10/21	E110	John Turner III; Cab fare to airport for MTD hearing prep	25.35
<b>Sub-Total of Expenses:</b>			<b>\$ 13,930.79</b>

**Meals**

Date	Task	Description	Amount
11/14/21	E111	Kate Charonko; Dinner while traveling to NY for Creditor Committee Member Meeting.	36.40
11/15/21	E111	Thomas Bennett; Meals for Tom Bennett NYC	1.71
11/15/21	E111	Thomas Bennett; Meals for Tom Bennett NYC	55.91
11/15/21	E111	Thomas Bennett; Meals for Tom Bennett NYC	11.24
11/15/21	E111	Thomas Bennett; Meals for Tom Bennett NYC	.52
11/15/21	E111	Kate Charonko; Breakfast while in NY for Creditor Committee Member Meeting.	53.73

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Date	Task	Description	Amount
11/16/21	E111	Kate Charonko; Dinner while traveling home from NY for Creditor Committee Member Meeting.	12.25
11/17/21	E111	Thomas Bennett; Meals for Tom Bennett NYC	9.25
11/20/21	E111	Thomas Bennett; Meals for Tom Bennett NJ	7.53
11/21/21	E111	Brian A. Glasser; Meals for Brian Glasser NJ	2.53
11/21/21	E111	Thomas Bennett; Meals for Tom Bennett NJ	4.00
11/21/21	E111	Thomas Bennett; Meals for Tom Bennett NJ	40.69
11/21/21	E111	Thomas Bennett; Meals for Tom Bennett NJ	88.97
11/23/21	E111	Thomas Bennett; Meals for Tom Bennett NJ	8.04
11/30/21	E111	Maggie Burrus; Breakfast and lunch at Graham DC	68.48
12/03/21	E111	John Turner III; Meal in connection with the MTD hearing prep trip	17.32
12/03/21	E111	Robert Bell; meals while in DC for discovery and trial prep meetings	80.58
12/03/21	E111	Robert Bell; hotel meal while in DC for discovery and trial prep meetings	47.60
12/06/21	E111	John Turner III; Meal in connection with the MTD hearing prep trip DC	8.98
12/08/21	E111	John Turner III; Meal in connection with the MTD hearing prep trip DC	15.18
12/09/21	E111	John Turner III; Meal in connection with the MTD hearing prep trip DC	24.90
<b>Sub-Total of Expenses:</b>			<b>\$ 595.81</b>

**Court Fees**

Date	Task	Description	Amount
12/01/21	E112	US District Court District of NJ - Pro Hac Vice Fee for B. Glasser and T. Bennett	300.00
12/03/21	E112	NJ Lawyers' Fund for Client - NJ State Fee for Pro Hac Vice Admission for B. Glasser and T. Bennett.	424.00
12/03/21	E112	NJ Lawyers' Fund for Client - NJ State Fee for Pro Hac Vice Admission for T. Bennett.	212.00
12/03/21	E112	NJ Lawyers' Fund for Client - NJ State Fee for Pro Hac Vice Admission for B. Glasser and T. Bennett. Void Check # - 000082577	-424.00
12/07/21	E112	Jason Kittinger; Court Solutions Fee for hearing on 12/07/2021 at 4:00 p.m.	50.00
12/08/21	E112	NJ Lawyers' Fund for Client - NJ State Fee for Pro Hac Vice Admission for B. Glasser.	212.00
<b>Sub-Total of Expenses:</b>			<b>\$ 774.00</b>

**Other**

Date	Task	Description	Amount
11/15/21	E124	Thomas Bennett; Toll Fee for Tom Bennett NYC	16.00
11/17/21	E124	Thomas Bennett; Toll Fee for Tom Bennett NYC	2.25

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Date	Task	Description	Amount
11/17/21	E124	Thomas Bennett; Toll Fee for Tom Bennett NYC	3.00
11/17/21	E124	Thomas Bennett; Toll Fee for Tom Bennett NYC	5.45
11/23/21	E124	Thomas Bennett; NJ Road Toll Fee for Tom Bennett NJ	3.00
12/03/21	E124	John Turner DC Lodging on 12/03/2021 12/10/2021.	700.00

**Sub-Total of Expenses: \$ 729.70**

**TOTAL EXPENSES ADVANCED \$ 17,967.57**

**TOTAL THIS INVOICE \$ 885,430.07**

**SUMMARY OF PROFESSIONAL SERVICES**

Name	Init	Staff Level	Hours	Rate	Total
Bell, Robert R.	RRB	Partner	78.30	850.00	66,555.00
Clark, Jaclyn S.	JSC	Associate	22.80	550.00	12,540.00
Mathews, D. Todd	DTM	Partner	43.20	750.00	32,400.00
Turner III, John G.	JGT	Partner	81.60	850.00	69,360.00
Barrett, Kevin W.	KB	Partner	50.50	975.00	49,237.50
Basdekis, Thanos	TB	Of Counsel	67.40	800.00	53,920.00
Bennett, Thomas B.	TBB	Of Counsel	95.80	975.00	93,405.00
Burrus, Maggie B	MBB	Associate	79.50	550.00	43,725.00
Charonko, Kate E.	KEC	Partner	109.00	750.00	81,750.00
Clackler, Tony L.	TLC	Associate	58.30	550.00	32,065.00
Dennis, Melissa D	MDD	Paralegal	6.40	325.00	2,080.00
Glasser, Brian A.	BAG	Partner	185.70	975.00	181,057.50
Joshi, Cary L	CLJ	Partner	101.20	750.00	75,900.00
Kittinger, Jason E.	JEK	Paralegal	33.60	325.00	10,920.00
McAllister, Brian J.	BJM	Associate	16.10	550.00	8,855.00
Rios, Manuel R.	MRR	Paralegal	3.90	325.00	1,267.50
Selby, David L.	DLS	Partner	69.90	750.00	52,425.00
<b>TOTALS</b>			<b>1,103.20</b>		<b>\$ 867,462.50</b>

**BAILEY & GLASSER LLP**

Talc Creditors Committee  
LTL Bankruptcy

December 18, 2021  
Invoice #: 86189

**TASK SUMMARY OF PROFESSIONAL SERVICES**

<b>Task</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
B110	B110 Case Administration	87.10	60,522.50
B140	B140 Relief from Stay/	9.40	8,535.00
B150	B150 Meetings of and	118.90	96,867.50
B160	B160 Fee/Employment Applic	10.30	10,042.50
B170	B170 Fee/Employment Objections	1.20	995.00
B190	B190 Other Contested Matters	811.40	637,107.50
B195	B195 Non Working Travel	64.90	53,392.50
	Time total	\$ 867,462.50	

**TASK SUMMARY OF EXPENSES ADVANCED**

<b>Task</b>	<b>Description</b>	<b>Amount</b>
E101	Copying	580.60
E102	Outside Printing	7.41
E106	Online Research	1,349.26
E110	Out-of-Town Travel	13,930.79
E111	Meals	595.81
E112	Court Fees	774.00
E124	Other	729.70
	Expense total	\$ 17,967.57

209 Capitol Street  
Charleston, WV 25301  
Tel: 304.345.6555  
Toll Free: 877.852.0342  
Fax: 304.342.1110

December 18, 2021

LTL Management Talc Creditors' Committee

Invoice #: 86189  
Client #: TCC0001  
Matter #: 2003717

RE: LTL Bankruptcy

**REMITTANCE ADVICE**

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**BALANCE DUE THIS INVOICE****\$ 885,430.07****AMOUNT PAID WITH THIS REMITTANCE****\$\_\_\_\_\_.**

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If paying by check, please return  
this page with payment to:

Bailey & Glasser LLP  
ATTN: Accounts Receivable  
209 Capitol Street  
Charleston, WV 25301  
(304) 345-6555

**Operating Account Wire Transfer Instructions**

**Receiving Bank ABA:** 083901896  
**Receiving Bank Name:** Bankers Bank of Kentucky  
**Receiving Bank Address:** 107 Progress Drive  
Frankfort, KY

**Beneficiary Bank ABA:** 044202505  
**Beneficiary Bank Account No.** 203159  
**Beneficiary Bank Name:** Peoples Bank  
**Beneficiary Bank Address:** 138 Putnam Street  
**Receiving Bank Address:** Marietta, OH 45750

**Beneficiary:** Bailey & Glasser LLP  
**Account Number:** 8400005222